

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEZ,)
PENNY POPE, OSCAR ORTIZ, KODY)
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY)
HERMAN, EVELYN BRICKNER, GORDON)
BENJAMIN, KEN GANDY, LEAGUE OF)
UNITED LATIN AMERICAN CITIZENS)
(LULAC), AND DALLAS COUNTY,)
TEXAS,) CIVIL ACTION
Plaintiffs,) NO.
v.) 2:13-CV-193
) (NGR)
) [Lead case]
RICK PERRY, Governor of Texas;)
and JOHN STEEN, Texas Secretary)
of State,)
Defendants.)

UNITED STATES OF AMERICA,)
Plaintiffs,)
)
TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND, IMANI CLARK, AND)
MICHELLE BESSIAKE,)
Plaintiff-Intervenors,)
)
TEXAS ASSOCIATION OF HISPANIC)
COUNTY JUDGES AND COUNTY)
COMMISSIONERS, HIDALGO COUNTY,)
AND MARIA LONGORIA BENAVIDES,) CIVIL ACTION
Plaintiff-Intervenors,) NO.
v.) 2:13-CV-263
) (NGR)
) Consolidated
STATE OF TEXAS, JOHN STEEN, in) case
his official capacity as Texas)
Secretary of State; and STEVE)
MCCRAW, in his official capacity)
as Director of the Texas)
Department of Public Safety,)
Defendants.)

2 _____)
2 TEXAS STATE CONFERENCE OF NAACP)
BRANCHES; and the MEXICAN)
3 AMERICAN LEGISLATIVE CAUCUS OF)
THE TEXAS HOUSE OF)
4 REPRESENTATIVES,)CIVIL ACTION
Plaintiffs, NO.
5 2:13-CV-291
v. (NGR)
6)Consolidated
JOHN STEEN, in his official case
7 capacity as Secretary of State of)
Texas; and STEVE McCRAW, in his)
8 official capacity as Director)
of the Texas Department of Public)
9 Safety,)
Defendants.)
10 _____)
11 BELINDA ORTIZ, LENARD TAYLOR,)
EULALIO MENDEZ JR., LIONEL)
12 ESTRADA; ESTELA GARCIA ESPINOSA,)
LYDIA LARA, MARGARITO MARTINEZ)
13 LARA, MAXIMINA MARTINEZ LARA, AND)CIVIL
LA UNION DEL PUEBLO ENTERO, INC.)NO.
14 Plaintiffs, 2:13-CV-348
(NGR)
15 v.)Consolidated
(case
16 STATE OF TEXAS; JOHN STEEN, in his)
Official capacity as Texas)
17 Secretary of State; and STEVE)
McCRAW, in his official capacity)
18 As Director of the Texas)
Department of Public Safety,)
19 Defendants.)
20 _____
21 -----
22 ORAL DEPOSITION OF
23 LINDA LYDIA
24 JUNE 6, 2014
25 -----

A P P E A R A N C E S

FOR THE PLAINTIFFS:

AMY L. RUDD
DECHERT LLP
633 West 5th Street, 37th Floor
Los Angeles, CA 90071-2013

T: 213.808.5700
F: 213.808.5760
amy.rudd@dechert.com

FOR THE DEFENDANTS:

STEPHEN TATUM
OFFICE OF THE ATTORNEY GENERAL
209 West 14th Street
Austin, Texas 78711
T: 512.463.3133
D: 817.713.9492
stephen.tatum@texasattorneygeneral.gov

FOR PLAINTIFF UNITED STATES OF AMERICA:
(attended via teleconference)

Angela J. Miller
Trial Attorney
Voting Section, Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave., NW
NWB Room 7204
Washington, DC 20530
T: (202) 514-2919
angela.miller5@usdoj.gov

THE COURT REPORTER:
Karen L. D. Schoeve
Certified Realtime Reporter
Registered Diplomatic Reporter
Integrity Legal Support Solutions
Firm Registration No. 528
3100 W. Slaughter Lane, Suite A-101
Austin, Texas 78748
(512) 320-8690
(512) 320-8692 (fax)

1
2
3 ORAL DEPOSITION OF LINDA LYDIA,
4 produced as a witness at the instance of the
5 Defendants, and duly sworn, was taken in the
6 above-styled and numbered cause on June 6, 2014,
7 from 8:48 a.m. to 1:11 p.m., before Karen L. D.
8 Schoeve, CRR, RDR, in and for the State of Texas,
9 reported by machine shorthand, at the law offices
10 of Locke Lord, LLP, 2200 Ross Avenue, Suite 2200,
11 Dallas, Texas, pursuant to the Federal Rules of
12 Civil Procedure and the provisions stated on the
13 record or attached hereto.

	INDEX	PAGE
1		
2		
3		
4	Appearances	4
5	LINDA LYDIA	
6	Examination by Mr. Tatum	7
7	Examination by Ms. Rudd	---
8	Examination by Ms. Miller	---
9	Afternoon Session	126
10		
11	Changes and Signature	163
12	Reporter's Certificate	165
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 EXHIBIT INDEX	6
2 NO. DESCRIPTION PAGE	
3 Exhibit Number 1 13	
4 Defendants' Second Amended Notice of	
5 Intention to Take Oral Deposition of the	
Texas State Conference of NAACP Branches	
6 Exhibit Number 2 19	
7 Complaint for Declaratory and	
Injunctive Relief	
8 Exhibit Number 3 94	
E-mail chain	
Bates stamped TSC00006037 - 6039	
9 Exhibit Number 4 99	
10 E-mail chain	
Bates stamped TSC00006029 - 6031	
11 Exhibit Number 5 105	
12 E-mail chain	
Bates stamped TSC00006032 - 6036	
13 Exhibit Number 6 113	
14 Urgent Action Alert	
Bates stamped TSC00006061	
15 Exhibit Number 7 116	
16 Minutes of Executive Committee	
January 25, 2014 - Lufkin, Texas	
17 Exhibit Number 8 119	
18 Election Protection flyer	
Bates stamped TSC00006062 - 6063	
19 Exhibit Number 9 122	
20 Election Identification Certificate	
(EIC) Study	
21 TSC00006058	
22	
23	
24	
25	

1 Q. And, Miss Lydia, when were you born?	8
2 A. January 3rd, 1950.	
3 Q. Okay. Are you currently employed?	
4 A. Yes, I am.	
5 Q. Are where are you currently employed?	
6 A. Mersal Realty as a realtor and also	
7 part-time doing some marketing for a retail	
8 product, is what I call it.	
9 Q. Okay. May I ask what that retail	
10 product is --	
11 (Telephone interruption.)	
12 MS. MILLER: Hey there. This is	
13 Angela Miller from the DOJ.	
14 MS. RUDD: Hi, Angela. This is Amy	
15 Rudd. We just started, and your name is on the	
16 record.	
17 MS. MILLER: Okay. Great. Sorry.	
18 I thought we were starting later, so...	
19 MS. RUDD: No problem. That's why	
20 I e-mailed you. Just one sec.	
21 MR. TATUM: That was Angela Miller	
22 calling in, and I just realized I didn't allow	
23 you to make an introduction, Amy, if you'd like	
24 to.	
25 MS. RUDD: Amy Rudd for the Texas	

1 PROCEEDINGS	7
2	
3 LINDA LYDIA,	
4 having been first duly sworn, testified as	
5 follows:	
6 EXAMINATION	
7 BY MR. TATUM:	
8 Q. Good morning.	
9 A. Good morning.	
10 Q. My name is Stephen Tatum. I'm an	
11 assistant attorney general in the State of Texas,	
12 and I'm representing the defendants in this	
13 matter.	
14 This is Case Number 2:13-CV-193 in	
15 Federal District Court, Southern District of	
16 Texas, and consolidated cases.	
17 This is the deposition of Linda	
18 Lydia. It is about 8:48 on June 6th. We're here	
19 at the offices of Locke Lord in Dallas, Texas.	
20 Ms. Lydia, would you please state	
21 your full name for the record, please.	
22 A. Linda Darden Lydia.	
23 Q. And, Miss Lydia, where do you reside?	
24 A. I reside at the 1332 Bow Creek Drive,	
25 Duncanville, Texas 75116.	

1 State Conference of the NAACP.	9
2 MR. TATUM: Thank you.	
3 Q. (BY MR. TATUM) So, Miss Lydia, you	
4 were about to tell me about the product that you	
5 do marketing --	
6 A. The product is a real estate product;	
7 is a utility connection service for realtors.	
8 Q. Okay. And have you ever been deposed	
9 before?	
10 A. No.	
11 Q. Okay. I'm going to ask you some	
12 preliminary questions before we begin and then	
13 I'm going to go over some ground rules --	
14 A. Okay.	
15 Q. -- for control of the deposition.	
16 First, Miss Lydia, how are you	
17 feeling today?	
18 A. Sleepy.	
19 Q. Sleepy.	
20 A. Not enough sleep.	
21 Q. Okay. Are you suffering from any	
22 illness today that would affect your ability to	
23 provide accurate and truthful answers to my	
24 questions?	
25 A. No, sir.	

<p>1 Q. Are you taking any medications that 2 would affect your ability to provide accurate and 3 truthful answers to my questions?</p> <p>4 A. No, sir.</p> <p>5 Q. Is there anything else this morning 6 that might prevent you from accurately and 7 truthfully answering my questions?</p> <p>8 A. No.</p> <p>9 Q. That includes being sleepy.</p> <p>10 A. That's correct.</p> <p>11 Q. Okay. You understand that you've been 12 sworn to tell the truth today.</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. I'm going to be asking you some 15 questions, and I need you to answer them audibly 16 for the court reporter and those joining us over 17 the phone. Do you understand?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. If you would, please, if you're 20 going to answer yes or no to a question, please 21 say yes or no. Don't nod your head or shake your 22 head.</p> <p>23 A. Yes.</p> <p>24 Q. And, please, if you would, wait until I 25 finish stating my question before answering and I</p>	<p>10</p> <p>12</p> <p>1 you?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Ms. Lydia, what did you do to 4 prepare for your deposition today?</p> <p>5 A. I read through the complaint that was 6 filed by the State Conference and beyond that 7 not -- not --</p> <p>8 Q. Did you --</p> <p>9 A. I have discussed this with Amy and 10 beyond that, not anything.</p> <p>11 Q. Did you meet with anyone else besides 12 Amy in preparation for this deposition?</p> <p>13 A. I have had a discussion with Gary 14 Bledsoe, our attorney with the State Conference.</p> <p>15 Q. Okay. And when was that discussion?</p> <p>16 A. Probably a few days ago. I'm not sure 17 of the exact date.</p> <p>18 Q. And how long was that discussion?</p> <p>19 A. 15, 20 minutes, maybe.</p> <p>20 Q. Was anyone else a party to that 21 discussion?</p> <p>22 A. Amy was on the discussion -- was on the 23 phone because it was actually a conference call 24 and Yannis Banks, our paid staff person.</p> <p>25 Q. Were there any other meetings held in</p>
<p>1 will try to do the same to you when you are 2 answering.</p> <p>3 This is easier said than done.</p> <p>4 There may be times when we accidentally speak 5 over each other. I just ask that we try to allow 6 each other to finish before answering or asking a 7 question.</p> <p>8 Do you understand?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. If you don't understand a 11 question that I ask or you need clarification of 12 a question that I ask, please say so and I will 13 gladly rephrase or repeat the question.</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And there made be times today 16 when your attorney will object to a question that 17 I ask. In that case, you can still answer the 18 question unless your attorney specifically 19 instructs you not to.</p> <p>20 Do you understand?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And, Miss Lydia, you are 23 represented by counsel today; is that correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And is that Amy Rudd sitting next to</p>	<p>11</p> <p>13</p> <p>1 preparation for this deposition?</p> <p>2 A. No.</p> <p>3 Q. Other than the complaint, did you 4 review any other documents in preparation for 5 this deposition?</p> <p>6 A. No.</p> <p>7 Q. Okay. Overall how much time would you 8 say you spent review- -- preparing for this 9 deposition?</p> <p>10 A. Maybe an hour.</p> <p>11 Q. Maybe an hour?</p> <p>12 A. Yes.</p> <p>13 Q. Did you bring any documents with you 14 here today?</p> <p>15 A. I only brought the complaint and 16 directions or information about how to get here.</p> <p>17 And some insight into what I may be discussing.</p> <p>18 Q. Okay. Did you do anything else to 19 prepare that you did not already mention?</p> <p>20 A. No.</p> <p>21 (Deposition Exhibit Number 1 was 22 marked for identification.)</p> <p>23 Q. (BY MR. TATUM) Ms. Lydia, I'm handing 24 you what has been marked as Exhibit 1.</p> <p>25 MR. TATUM: Would you like a copy?</p>

14

1 MS. RUDD: Is it the topics?
 2 MR. TATUM: Yes.
 3 MS. RUDD: No.
 4 A. Okay.
 5 Q. (BY MR. TATUM) Miss Lydia, have you
 6 ever seen this document before?
 7 A. (Witness examined exhibit.)
 8 I'm not sure, to be perfectly
 9 honest. I get a lot of documents forwarded to
 10 me.
 11 Q. Um-hum.
 12 A. But I'm not sure if this one in
 13 particular -- I can't say for sure.
 14 Q. You can hold on to that.
 15 A. Okay.
 16 Q. And, Miss Lydia, I represent to you
 17 that this is the Defendants' Seconded Amended
 18 Notice of Intention to Take Oral Deposition --
 19 A. Okay.
 20 Q. -- of the Texas State Conference of
 21 NAACP Branches.
 22 A. Okay.
 23 Q. In other words, this is the notice of
 24 the intent to take your --
 25 A. Okay.

16

1 MS. RUDD: And, Stephen, let me
 2 just say for the record that because Linda
 3 operates the executive level of the Texas NAACP,
 4 there may be topics in here that she's just not
 5 familiar enough with the subject matter to
 6 discuss, and she can tell you that in the context
 7 of today's deposition.
 8 MR. TATUM: Okay.
 9 Q. (BY MR. TATUM) Miss Lydia, are you
 10 aware that you've been designated by the Texas
 11 NAACP to testify on its behalf regarding the
 12 matters contained in this notice?
 13 A. Yes, sir.
 14 Q. And are you willing and able to give
 15 binding answers to questions that are based on
 16 the matters contained in this notice?
 17 A. I would say some of them.
 18 Q. Are there any -- at the outset, upon
 19 looking at it in front of you, that you are not
 20 able to testify to?
 21 A. I would say there are a number of them.
 22 Q. Can you point out which ones those are.
 23 A. (Witness examined exhibit.)
 24 I'm needing to read them.
 25 Q. Take your time.

15

1 Q. -- deposition.
 2 A. Okay. Got you. All right.
 3 Q. And again, please, if you don't mind,
 4 wait until I finish --
 5 A. Okay.
 6 Q. -- stating the question before you
 7 answer so we don't talk over each other.
 8 Miss Lydia, would you do me a favor
 9 and turn to Page 5, please.
 10 Are you there?
 11 A. Yes, sir.
 12 Q. Okay. At the bottom of that page
 13 there's a section entitled "Matters." Do you see
 14 that?
 15 A. Yes, sir.
 16 Q. Okay. Following that title and on the
 17 succeeding pages there are a number of -- there
 18 is a list of numbered paragraphs from 1 to 24
 19 going onto page 8. Do you see those paragraphs?
 20 A. Yes, sir.
 21 Q. Okay. These are the matters that we
 22 have noticed we'll be discussing in this
 23 deposition today. The Texas NAACP has stated
 24 that they are not producing a witness to testify
 25 to topics 3, 4, and 18.

17

1 A. Okay. Thank you. (Witness examined
 2 exhibit.)
 3 There are a few that I'm not sure
 4 that I completely understand, Mr. Tatum. And
 5 then there's some that I definitely do not have
 6 knowledge of.
 7 Q. So to confirm, some of these matters
 8 you don't understand --
 9 A. Um-hum. I don't fully understand.
 10 Q. Sorry. If you don't mind, please let
 11 me finish my question.
 12 There are some matters on here that
 13 you don't understand, and there are others that
 14 you are not prepared to testify to?
 15 A. That's correct.
 16 Q. Can you indicate which matters you are
 17 not prepared to testify to today?
 18 A. The identity of your members on
 19 September 17th, 2013.
 20 Q. And if you want to, you can just point
 21 out the numbered paragraph.
 22 A. Okay. Number 3.
 23 Number 4.
 24 Number 12.
 25 Number 13.

18

1 Number 14.
 2 Number 15.
 3 Number 17.
 4 Number 18.
 5 Number 21.
 6 Number 23.
 7 And Number 24.
 8 Oh, I'm sorry, and I missed
 9 Number 7.
 10 Q. So to confirm, you are not prepared to
 11 testify to Topics 3, 4, 7, 12, 13, 14, 15, 18,
 12 21, 23 and 24; is that correct?
 13 17 in his list.]
 14 A. Yes, sir.
 15 Q. And also to confirm, this is the first
 16 time today that you've seen this document?
 17 A. Yes, sir.
 18 Q. So the topics that you did not mention,
 19 you are prepared to testify to today?
 20 A. I think I said there were two sets of
 21 --
 22 Q. That you didn't --
 23 A. -- concerns. One is I didn't
 24 understand some of the questions. And the other
 25 one is one I definitely do not have knowledge of.

20

1 Q. Do you feel like you were prepared to
 2 testify about the factual bases of the claims
 3 stated in this complaint?
 4 A. For the most part.
 5 Q. For the most part. Okay.
 6 (Discussion off the record.)
 7 Q. (BY MR. TATUM) And, Ms. Lydia, you
 8 mentioned your employment in the real estate
 9 industry.
 10 A. Yes, sir.
 11 Q. Are you also employed by the Texas
 12 NAACP?
 13 A. No, I'm not.
 14 Q. What is your involvement with the Texas
 15 NAACP?
 16 A. I'm an elected officer of the Texas
 17 NAACP.
 18 Q. And as an elected officer, do you have
 19 an official title?
 20 A. Yes, I do.
 21 Q. And what is that?
 22 A. Secretary.
 23 Q. And when were you elected to that
 24 position?
 25 A. Gosh, probably about eight years ago --

19

21

1 Q. Okay. We'll see how these play out as
 2 we go along.
 3 MS. RUDD: I think that's the best
 4 way to do it.
 5 MR. TATUM: Okay.
 6 (Deposition Exhibit Number 2 was
 7 marked for identification.)
 8 Q. (BY MR. TATUM) Miss Lydia, I'm handing
 9 you what's been marked as Exhibit 2.
 10 A. Um-hum.
 11 Q. And I believe based on what you said
 12 earlier that you will recognize this document --
 13 A. Okay.
 14 Q. -- but let me just ask. Do you
 15 recognize this document?
 16 A. Yes.
 17 Q. And what is this document?
 18 A. This is the complaint for declaratory
 19 and injunctive re -- for relief. Sorry.
 20 Q. And was this complaint filed by the
 21 Texas NAACP?
 22 A. Yes.
 23 Q. Okay. Did you assist or help in any
 24 way in the preparation of this document?
 25 A. No.

1 and I'm not certain, but that is a speculation.
 2 Around eight years ago.
 3 Q. That would be 2006?
 4 A. Yes.
 5 Q. And I think you answered this already,
 6 but is that a paid position?
 7 A. No.
 8 Q. You act as secretary on a voluntary
 9 basis?
 10 A. That's correct.
 11 Q. Okay. And when you say "secretary," is
 12 that secretary of the Texas NAACP?
 13 A. That's correct.
 14 Q. And I want to clarify, when I refer
 15 to -- I'll be talking about the Texas NAACP. And
 16 when I say the Texas NAACP, I mean the Texas
 17 Conference of NAACP Branches.
 18 A. Units.
 19 Q. Units.
 20 A. Um-hum.
 21 Q. They're also referred to as units?
 22 A. That's correct.
 23 Q. Okay. In this case they've been called
 24 branches --
 25 A. Okay.

22

1 Q. -- so I'll call them branches.
 2 A. That's fine.
 3 Q. And there may be times when I just say
 4 "NAACP." If I do that, I'm referring to the
 5 Texas Conference. If I intend to speak to the
 6 national NAACP, I will say so, and if that's not
 7 clear, please ask me to clarify.

8 A. Yes.

9 Q. Okay. So you said you were the
 10 secretary for the Texas NAACP, correct?

11 A. Yes.

12 Q. Okay. How long have you held that -- I
 13 believe you said you've held that position for
 14 eight years?

15 A. Approximately. I -- I also said I do
 16 not know the exact date. So it's somewhere in
 17 that area. Not for certain though.

18 Q. Did you do anything for the Texas NAACP
 19 before that?

20 A. Yes.

21 Q. And what was that?

22 A. I was a state youth advisor.

23 Q. And what does a state youth advisor do?

24 A. Coordinate the activities of our youth
 25 in college units in our state.

23

25

1 Q. And how long were you a state youth
 2 advisors?

3 A. Probably for six years. Again, I'm not
 4 sure of the exact dates.

5 Q. Did you do anything for the Texas NAACP
 6 before you were a state youth advisor?

7 A. I'm trying to make certain I'm not
 8 overlooking something and not answering
 9 factually. I know I served in the capacity as
 10 our ACT-SO coordinator, which is Academic,
 11 Cultural, Technology and Scientific Olympics.
 12 That's done on a statewide basis. So I've done
 13 that.

14 I think that's pretty much the
 15 capacities that I've held within the State
 16 Conference.

17 Q. So you've been secretary for eight
 18 years. Before that you were state youth advisor
 19 for four to six years --

20 A. Um-hum.

21 Q. -- roughly, and before that you were in
 22 the roles you just spoke to. Overall, how many
 23 years have you been working for or with the Texas
 24 NAACP?

25 A. I would say probably around 20 years.

1 Q. Okay. When did you first become a
 2 member of the Texas NAACP?

3 A. I don't have a membership with the
 4 Texas NAACP.

5 Q. You are not a member of the Texas
 6 NAACP?

7 A. We do not have memberships within the
 8 Texas State Conference of NAACP branches or
 9 units, whichever term you use. The memberships
 10 would rest with the national via a branch or a
 11 unit. I am actually a member of the Dallas
 12 NAACP.

13 Q. So you're a member of the Dallas
 14 branch --

15 A. Um-hum.

16 Q. -- of the Texas NAACP?

17 A. Well, the branches come under the Texas
 18 State Conference auspices. But the membership
 19 rests with the branches. Branches, youth
 20 councils and college chapters hold the
 21 memberships. The State Conference does not have
 22 memberships. Even our president, his membership
 23 would be with a branch.

24 Q. So you're -- I'm just trying to make
 25 sure I understand this.

1 A. Um-hum.

2 Q. You're a member of the Dallas branch --

3 A. Um-hum.

4 Q. -- of the Texas NAACP or the National
 5 NAACP?

6 A. National NAACP.

7 Q. Okay. And how long have you been a
 8 member of the Dallas branch of the National
 9 NAACP?

10 A. I've been a member of the NAACP
 11 probably for, I would say, 40 years. Not
 12 necessarily affiliated with the Dallas branch
 13 because I've lived in various locations.

14 Q. Where have you lived?

15 A. I lived in Nashville, Tennessee. I was
 16 a member of a college chapter in Nashville,
 17 Tennessee.

18 I was a member of a unit in Grand
 19 Prairie, Texas.

20 I was also a member of a unit in
 21 Los Angeles, California.

22 And back to Dallas with the Dallas
 23 NAACP.

24 Q. So when you move -- moved back to
 25 Dallas, you did not need to fill out a -- or,

26

1 apply for a new membership to the Dallas branch.
 2 Your previous membership stayed with you?
 3 A. Our membership structure is such, you
 4 can either buy a yearly membership or you can buy
 5 life memberships. When I joined the Grand
 6 Prairie NAACP, I became a life member. So my
 7 life membership could be transferred from one
 8 unit to another unit with a life membership
 9 versus a yearly membership.

10 Q. All right. And that involves a
 11 one-time fee?
 12 A. A one-time fee.

13 Q. Okay. As secretary for the Texas
 14 NAACP, what are your official duties or
 15 responsibilities?

16 A. Multitude. I do communication to our
 17 units. That's generated by members of our
 18 executive committee. That would include our
 19 officers and our standing committee chairs.
 20 I also provide information to our
 21 units, our branches and our youth councils and
 22 our college chapters regarding activities
 23 programming of our state conference.
 24 I collect or take minutes of
 25 meetings.

28

1 does. I will be doing that or I will designate
 2 our assistant secretary to assist in performance.
 3 Q. Earlier when you said -- I believe you
 4 said something to the effect of
 5 "constitutionally" you manage one person or
 6 something to that effect.

7 A. Yes. I did say that.
 8 Q. Okay. When you refer -- when you say,
 9 "constitutionally," are you referring to some
 10 kind of governing document?

11 A. Yes.
 12 Q. Okay. And what is that?
 13 A. That would be our bylaws for our state
 14 conference.
 15 (Discussion off the record.)
 16 Q. (BY MR. TATUM) So, Miss Lydia, you are
 17 on the executive committee of the Texas NAACP,
 18 correct?
 19 A. Yes.
 20 Q. And you attend, to the extent that you
 21 can, all of the regular meetings of the executive
 22 committee?
 23 A. That's correct.
 24 Q. How often does the executive committee
 25 meet?

27

29

1 I coordinate our planning of
 2 meetings, whether it's quarterly meetings or our
 3 state conventions or other specially designated
 4 meetings that we have during the year for various
 5 purposes.

6 Q. Do you manage or supervise anyone?
 7 A. Constitutionally, I manage our one paid

8 staff person and that would be Yannis Banks.
 9 Q. And when you say "constitutionally,"

10 what are you referring to?
 11 A. Well, at one time I did a lot of

12 management of Yannis, but with our legislative
 13 session and the onset of a number of different

14 things, we sort of shifted his position to be a
 15 legislative liaison. And so at that time because

16 of the geographical proximity -- he lives in
 17 Austin, I live in Dallas, it was so much easier
 18 for that become -- come under the purview of Gary

19 Bledsoe, our State Conference president.
 20 Q. When you --

21 A. We actually --
 22 Q. Sorry. Go ahead.

23 A. We actually needed him more in that
 24 capacity than doing some of the administrative

25 things that he should have been doing or normally

30

1 Q. And who would you say you communicate
2 with?

3 A. People in membership, branch and field
4 services, youth and college division, finance.

5 Q. What is the branch and field services?

6 A. The branch and field services would be
7 the department that would oversee the operation
8 of our units throughout the country.

9 Q. How much time a week, generally, do you
10 spend fulfilling your duties as secretary of the
11 Texas NAACP as opposed to your other job in real
12 estate?

13 A. That actually would vary, Mr. Tatum.
14 Let's just say I probably spend, on an average,
15 for the first six months of the year, probably 10
16 to 20 hours a week, and during convention
17 preparation, probably 40 hours a week.

18 Q. So at that point it almost becomes like
19 a full-time job?

20 A. Exactly. And it definitely has become
21 more so that in the last few years.

22 Q. As secretary, are you involved -- and I
23 think you may have said this -- are you involved
24 in finance matters with the Texas NAACP?

25 A. Yes, I am.

32

1 state conference level. We're supposed to be
2 doing that function to grow the organization from
3 the ground.

4 Q. And what kind of activities are
5 involved with the recruiting and retention of
6 members at the branch level?

7 A. The branch had various events, whether
8 it's membership recruitment at churches or
9 events. They also send out solicitation, some
10 branches do and some don't. So there is not a
11 real consistent way that they go about doing the
12 recruiting other than the fact that they do.

13 Q. Now, you mentioned fundraising. What
14 would you say is the primary source of funding
15 for the Texas NAACP?

16 A. I would say it would definitely be
17 corporate support and sponsorship.

18 Q. Are you involved with soliciting
19 corporate support and sponsorship?

20 A. Yes, I am.

21 Q. And what does that involve?

22 A. Letter writing, for the most part.
23 Phone calling. Following up with information
24 needed for sponsorship.

25 Q. Do you know roughly how many -- when

31

33

1 Q. Including budgeting and any other kind
2 of financial matters?

3 A. Probably more in the area of
4 fundraising. I also am responsible for execution
5 of vouchers for reimbursement of expenditures.

6 Q. Reimbursement of expenditures by Texas
7 NAACP employees?

8 A. Also for some of the volunteers who may
9 be functioning in the capacity of our state
10 conference doing various tasks.

11 Q. And do you participate in the
12 organization or -- let me state that again.

13 Do you participate in the
14 organization of these volunteers that you refer
15 to?

16 A. Yes. I would think to some degree.

17 Q. How does the Texas NAACP attract new
18 members?

19 A. Again, the Texas NAACP does not have
20 members. The units would be attracting new
21 members. In the past, and not so much recently,
22 we have done a number of different things to
23 assist the branches in membership recruitment and
24 retention, which is a very important piece of
25 what it is we're supposed to be doing on the

1 you combine all of the members of the various
2 branches that make up the Texas NAACP --

3 A. Um-hum.

4 Q. -- do you know how many members that
5 includes?

6 A. I would say approximately 10,000.

7 Q. Do you recall when you began your role
8 as secretary what the membership was then,
9 generally?

10 A. No.

11 Q. Do you think it's increased over the
12 years?

13 A. I'll be honest with you. I'm not
14 really certain of that. Again, because we do not
15 have membership rosters, so I wouldn't know that,
16 really.

17 Q. Do the local branches keep membership
18 rosters?

19 A. Um-hum. Yes, they do.

20 Q. Do the local branches submit any kind
21 of report or summaries of their activities or
22 memberships to the executive committee?

23 A. They do submit quarterly reports that
24 are sent to the State Conference as well as to
25 the national office so they're required

34

1 constitutionally.
 2 There is no reporting of their
 3 membership totals to us. That information is
 4 held between the branches -- let me just say,
 5 there are three different types of units that we
 6 deal with. We have branches which are the adult
 7 units. We have youth council which are
 8 individuals under the age of 18, usually high
 9 school or middle school students, and then we
 10 have college chapters which is just what it says.

11 Students who are in college.
 12 Q. Um-hum.
 13 A. So that information is contained --
 14 their membership is contained within those units.
 15 Their memberships are solicited and forwarded to
 16 the national office. It has to go up the ladder
 17 to the national office in order to obtain a
 18 membership in the organization. It's not
 19 created. That membership is not created on the
 20 local level or the State Conference level, which
 21 is the intermediary in this hierarchy.

22 So that information is held by the
 23 units in the national office. We are in there
 24 just to assist the units as the first stop along
 25 the way.

1 kind of events, the executive committee, the
 2 Texas State Conference, they are in charge of
 3 supervising the organization of those activities.
 4 A. You're correct.
 5 Q. Okay. Does the Texas State
 6 Conference -- let me rephrase.
 7 Do the local branches of Texas --
 8 let me say that again.
 9 Do the Texas branches of the
 10 National NAACP share the same missions -- mission
 11 statement and goals as the National NAACP?
 12 A. Yes.
 13 Q. Okay. They don't have any separate
 14 mission statements, goals or values apart from
 15 the National NAACP?
 16 A. No, sir, they do not.
 17 Q. Miss Lydia, do you know what this
 18 lawsuit is about?
 19 A. Yes, sir.
 20 Q. Can you tell me your understanding of
 21 what this lawsuit is about?
 22 A. It's in response to Senate Bill 14.
 23 Q. And when you say "Senate Bill 14," you
 24 mean Senate Bill 14 passed in 2011?
 25 A. Exactly.

35

1 Q. When you say "we," you mean the Texas
 2 State Conference?
 3 A. Yes.
 4 Q. So the Texas State Conference, which is
 5 made up of the executive committee --
 6 A. Um-hum.
 7 Q. -- acts as kind of a supervising or
 8 governing body of the local branches; is that
 9 correct?
 10 A. Yes.
 11 Q. Okay.
 12 A. But let me add, with the ultimate
 13 programming and any other ultimate decisions are
 14 done on the national level. We supervise them in
 15 an intermediary status.
 16 If, in fact, they do not feel that
 17 our supervision is appropriate, then they
 18 obviously have a right to go to the national, and
 19 they have the final word. The national office
 20 always has the final word because they are the
 21 origin of the membership.
 22 Q. All right. But when it comes to
 23 organizing events, such as you mentioned
 24 quarterly meetings, you mentioned a state
 25 convention, when it comes to organizing those

37

1 Q. You said it's in response to Senate
 2 Bill 14, correct?
 3 A. Yes, sir.
 4 Q. And from here on out, I'll just refer
 5 to it as SB 14, is that okay?
 6 A. That's great.
 7 Q. Okay. Can you elaborate on "in
 8 response to SB 14." What does that mean?
 9 A. It is the bill that required voters in
 10 the state of Texas, in addition to having their
 11 voter registration card, that they had to have
 12 some form of pictured ID in order to vote in the
 13 electoral process in the state.
 14 Q. Do you know what those forms of photo
 15 ID required by SB 14 are?
 16 A. I think I could probably get most of
 17 them. Passport, a right to carry card.
 18 Q. By that do you mean concealed handgun
 19 license?
 20 A. Exactly. A driver's license, an EIC,
 21 and there's one other -- or there's two others.
 22 Let me think about it. Passport . . . I'm
 23 sorry, I can't come up with the others.
 24 Q. Is one of those forms that you did not
 25 come up with a personal ID card with a photograph

38

1 on it?

2 A. If you're talking about the EIC
3 card . . . Is that what you're talking about?
4 Or are you talking about the DPS identification
5 card?

6 Q. I'm not talking about an EIC. I am
7 talking about the DPS identification.

8 A. Yes, I'm sorry. That was one of them,
9 yes.

10 Q. And is another one an unexpired
11 military ID was one of them.

12 A. Exactly. That's the sixth one.

13 Q. Okay.

14 A. Exactly.

15 Q. What is an EIC?

16 A. Your Election Identification
17 Certificate that you can go to DPS and acquire if
18 you are trying to register to vote and you need
19 identification and you don't have the other
20 documentation.

21 Q. Of those forms of ID that you just
22 listed, do you have any of those forms of ID?

23 A. I have a Texas driver's license and I
24 also have a passport.

25 Q. And those are both unexpired as of

1 A. That impact is the burden of acquiring
2 an additional piece of identification when we
3 were operating with a voter's registration card.
4 And I guess in most states they still will
5 operate with a voter registration card, as the
6 only piece of identification needed to vote.

7 Q. Miss Lydia, are you aware that the
8 United States is a party to this lawsuit
9 represented by the Department of Justice?

10 A. Yes.

11 Q. Is it the position of the Texas NAACP
12 that the United States does not adequately
13 represent its interest in this lawsuit?

14 MS. RUDD: Objection --

15 A. I really couldn't --

16 MS. RUDD: Sorry. Objection calls
17 for a legal conclusion. You can answer.

18 A. I really couldn't answer that question.

19 Q. (BY MR. TATUM) Miss Lydia, in joining
20 this lawsuit, is the Texas NAACP representing the
21 rights of itself as an organization?

22 A. Its rights as an organization for its
23 members, yes.

24 Q. So it's representing the rights of the
25 members of the local branches?

39

1 today?

2 A. Yes, sir.

3 Q. Miss Lydia, do you vote?

4 A. Yes, I do.

5 Q. When was the last time that you voted?

6 A. In the last election we had about two
7 weeks ago.

8 Q. Miss Lydia, have you ever been unable
9 to vote because of the requirements of SB 14?

10 A. No.

11 Q. Have you ever been unable to vote for
12 any other reason?

13 A. No.

14 Q. Miss Lydia, why do you choose to vote?

15 A. It is an absolute right that we have
16 earned and very hard-fought earned. So I feel a
17 strong sense of responsibility to vote for those
18 people who did make those valiant efforts to open
19 those doors for us to vote. Because for many
20 years we were denied the right to vote.

21 Q. Miss Lydia, why did the Texas NAACP
22 join this lawsuit?

23 A. Because of the impact it will have on
24 minorities.

25 Q. And what is that impact?

1 MS. RUDD: Objection. Misstates
2 testimony.

3 MR. TATUM: Let me rephrase.

4 Q. (BY MR. TATUM) In joining this
5 lawsuit, is the Texas NAACP representing its
6 members -- or the members of the local branches?

7 A. I would say yes.

8 Q. Okay. Do you know if any of the
9 individual members of the Texas NAACP branches
10 sought to obtain counsel on their own to join
11 this lawsuit?

12 A. Not to my knowledge.

13 Q. Is legal representation a benefit of
14 being a member of the NAACP?

15 A. In some cases.

16 Q. Stated another way, does the Texas
17 NAACP offer legal representation to its members?

18 A. In some cases.

19 Q. And what cases are those, normally?

20 A. Well, I think this particular complaint
21 would be the best example.

22 Q. Are there any other examples you can
23 think of?

24 A. I'm sure there are others, but I'm
25 sorry, it's not at the top of mind right now --

42

1 top of my mind right now.
 2 Q. Miss Lydia, how was the decision made
 3 to join or initiate this lawsuit?
 4 MS. RUDD: And I just want to
 5 caution you, Linda, not to reveal anything that
 6 might have been discussed in conversations with
 7 attorneys, including Mr. Bledsoe.
 8 A. I'm not sure.
 9 Q. (BY MR. TATUM) Was there a meeting to
 10 discuss the possibility of joining this lawsuit?
 11 A. Not sure of that either.
 12 Q. Did you attend any meetings where the
 13 topic of joining this lawsuit was discussed?
 14 A. There would have been an approval by
 15 our executive committee.
 16 Q. And you're on the executive committee,
 17 correct?
 18 A. Yes, I am.
 19 Q. Okay. Do you recall approving -- or do
 20 you recall when the executive committee approved
 21 the initiation of this lawsuit?
 22 A. I have no idea, but it would have had
 23 to predate the actual filing.
 24 Q. Of course. I'm talking now about the
 25 period of time before this complaint was filed.

43

1 During that time, do you recall when the decision
 2 was made to join this lawsuit?
 3 A. I'm sorry, I don't. Not the date. I
 4 could not even begin to speculate on that.
 5 Q. But am I correct in saying that the
 6 decision -- or the initiation of this lawsuit by
 7 the Texas NAACP would have to have been approved
 8 by the executive committee; is that correct?
 9 A. Yes, that's correct.
 10 Q. And you were on the executive
 11 committee, correct?
 12 A. Yes, sir.
 13 Q. But you do not recall any instance when
 14 that approval was made; is that correct?
 15 A. I don't recall the exact date that it
 16 was made -- or it was approved, I think is what
 17 you said.
 18 Q. But the initiation of this lawsuit was
 19 approved by the executive committee; is that
 20 correct?
 21 A. Yes, sir. It was approved by the
 22 executive committee and also it would have had to
 23 have been approved by the national office of the
 24 NAACP. Both would have had to be obtained prior
 25 to filing.

44

1 Q. At the Texas level, did that approval
 2 come in the form of a vote?
 3 A. Yes, sir.
 4 Q. And who participated in that vote?
 5 A. The executive committee members.
 6 Q. And was it on a -- was approval based
 7 on a majority of the vote?
 8 A. Yes, sir.
 9 Q. Did you vote?
 10 A. I'm sure -- I probably was taking
 11 minutes, to be quite honest with you.
 12 Q. You were taking minutes of the meeting
 13 at which a decision to join this lawsuit was
 14 approved; is that correct?
 15 A. That would -- that would be correct.
 16 Q. Was anyone else, besides those on the
 17 executive committee, present at that meeting?
 18 A. No. Would not have been.
 19 Q. It would have been solely the executive
 20 committee?
 21 A. Yes, sir. And they would have been the
 22 only individuals who could have voted on it.
 23 Q. Was the meeting at which this vote or
 24 approval took place, was that meeting publicized
 25 to the Texas NAACP membership?

45

1 A. No. And let me add something to this.
 2 Some of this -- this meeting could have very
 3 well -- that's why I'm hesitating to say when it
 4 happened. This could have been via a conference
 5 call of the executive committee and only those
 6 individuals would have been invited to the call
 7 and would have been allowed to vote. So -- or we
 8 could have sent it out. You know, I'm not really
 9 certain, okay?
 10 So it's not that I'm trying to be
 11 evasive. It's just that I don't know.
 12 Q. Okay. Was the membership -- was the
 13 Texas NAACP membership aware that such a vote was
 14 taking place?
 15 A. You're talking about the people outside
 16 of the executive committee?
 17 Q. Exactly.
 18 A. I doubt it.
 19 Q. Was any kind of input or concerns of
 20 the membership considered in making the vote to
 21 join this lawsuit?
 22 A. Most definitely.
 23 Q. And in what form was that input? Was
 24 it letters? Phone conversations with the
 25 membership?

<p>1 A. I would say both, and we have had like 2 legislative days when we would go over bills that 3 are pending approval or that have been approved. 4 And at those sessions people would discuss the 5 impact of legislation of this nature or other 6 bills that were pending or that have been passed 7 that they felt would be akin to them.</p> <p>8 Q. At the executive committee level -- and 9 let me stop here for a second. The executive 10 committee -- as briefly as you can, tell me who 11 makes up the executive committee.</p> <p>12 A. Sure. Our elected adult officers, the 13 president and secretary of the youth and college 14 division, which is actually a separate division 15 of our State Conference, and all of the standing 16 committee chairs. There -- I think we may have 17 as many as 15 standing committee chairs, so they 18 would comprise the executive committee.</p> <p>19 Q. Is -- are the identities of the 20 executive committee members, is that available to 21 the public anywhere? For instance, on the -- 22 sorry. For instance, on the Texas NAACP website?</p> <p>23 A. I'm not even sure our website is up, so 24 I'm going to be really hesitant to answer that 25 one. I'm not positive, but I know our membership</p>	<p>46</p> <p>1 you want to ask about the subject matter without 2 getting into any discussions that were had, I'm 3 perfectly fine with that.</p> <p>4 MR. TATUM: Okay. Let me rephrase 5 the question.</p> <p>6 Q. (BY MR. TATUM) Was the -- at this 7 meeting, where the joining of this lawsuit was 8 voted on and approved, was the topic of the 9 resources involved in litigating a case like this 10 discussed?</p> <p>11 A. I really don't recall that.</p> <p>12 Q. If it were discussed, would it be 13 contained in the minutes that you were keeping at 14 this meeting?</p> <p>15 A. Yes.</p> <p>16 Q. Where are those minutes held or where 17 are they filed?</p> <p>18 A. In our State Conference office.</p> <p>19 Q. Okay. Are those publicly available?</p> <p>20 A. No.</p> <p>21 Q. In any of the discussions leading up to 22 the filing of this lawsuit by the Texas NAACP, 23 were there any discussions or meetings held with 24 the -- with any other party to this lawsuit?</p> <p>25 A. If there were any meetings or</p>
<p>47</p> <p>1 in the branches would know because we -- for 2 example, we have a criminal justice chair on the 3 state conference level. We also have a criminal 4 justice chair in our branches and youth councils 5 and college chapters. And so they provide some 6 leadership and programmatic kinds of input to 7 those individuals to assist them. And that would 8 be true of all of our standing committee chairs.</p> <p>9 Q. Okay. Going back to the meeting of the 10 executive committee where the topic of joining 11 this lawsuit was discussed --</p> <p>12 A. Um-hum --</p> <p>13 Q. -- and ultimately approved --</p> <p>14 A. Um-hum.</p> <p>15 Q. -- was there any discussion about the 16 resources involved in litigating a case like 17 this?</p> <p>18 MS. RUDD: And I'm going to object 19 on the basis of attorney/client privilege and 20 instruct the witness not to answer.</p> <p>21 MR. TATUM: Just to be clear, are 22 you objecting on the basis of the topic or the 23 content of --</p> <p>24 MS. RUDD: Okay. So that's a good 25 clarification. I'm objecting to the content. If</p>	<p>49</p> <p>1 discussions, I'm not -- I wasn't involved in them 2 and would not be aware of them.</p> <p>3 Q. Who would be involved in that kind of 4 meeting?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Would it be someone at the executive 7 committee level?</p> <p>8 A. Well, I'm sure our president would have 9 been involved. And perhaps our staff person, who 10 is our legislative liaison. I'm not certain of 11 whom else would be involved. You know, I can 12 speculate about it, but I wouldn't know for 13 certain.</p> <p>14 Q. Do you know if the Texas NAACP had any 15 kind of meetings or discussions with the Mexican 16 American Legislative Caucus leading up to the 17 initiation of this lawsuit?</p> <p>18 A. I have no idea, but I just noticed on 19 this that there was something about the Hispanic 20 community. So I would tend to think based on 21 what I've read that, yes, there was and from 22 reading this, yes, I would say definitely there 23 was.</p> <p>24 Q. Have you yourself as secretary had any 25 communications with the Mexican American</p>

50

1 Legislative Caucus?
 2 A. Not in an official capacity.
 3 Q. Did you have any communications with --
 4 and I'll just call them MALC -- in any other
 5 capacity?
 6 A. I assisted in planning a meeting during
 7 the legislative session. But beyond that, no.
 8 Q. And what was that meeting about?
 9 A. It was a dinner. It was just a dinner.
 10 Q. Do you recall what legislative session
 11 that was?
 12 A. It would have been the last session.
 13 Q. In 2013?
 14 A. No. Actually would have been -- yeah,
 15 it would have been 2'13. Yes. It would have
 16 been 2'13.
 17 Q. Do you know if the Texas NAACP had any
 18 meetings or discussions with the Texas League of
 19 Young Voters leading up to the initiation of this
 20 lawsuit?
 21 A. No knowledge of that.
 22 Q. Okay. Do you know if the Texas NAACP
 23 had any kind of meetings or discussions with any
 24 other organization or group leading up to the
 25 initiation of this lawsuit?

52

1 Q. You mentioned Lobby Day.
 2 A. Um-hum.
 3 Q. What is Lobby Day?
 4 A. Lobby Day is where we have our units.
 5 We all gather in the Austin area, and we have an
 6 education chair who will identify bills that are
 7 being proposed or pending passage that will
 8 impact education in our state.
 9 We have our political action chair
 10 who will address those that are impacting
 11 political action. With the various standing
 12 committees, they pretty much will coordinate --
 13 (Phone interruption.)
 14 MR. TATUM: I'm sorry.
 15 THE WITNESS: That's okay.
 16 A. -- the concerns of their standing
 17 committee.
 18 We have criminal justice.
 19 We have education.
 20 We have political action.
 21 We have youth initiatives.
 22 So it covers the full-spectrum of
 23 what's going on in our communities.
 24 Q. (BY MR. TATUM) And who's in charge of
 25 organizing Lobby Day?

51

53

1 A. No knowledge.
 2 MR. TATUM: Are you -- is everyone
 3 all right as far as -- do we need to take a
 4 break?
 5 MS. RUDD: I'm fine.
 6 Are you okay, Linda, or do you need
 7 a break?
 8 THE WITNESS: I'm good.
 9 Q. (BY MR. TATUM) Miss Lydia, you
 10 mentioned the Texas NAACP's involvement with
 11 various activities at the Texas legislature.
 12 A. Um-hum.
 13 Q. Can you tell me a little bit more about
 14 that.
 15 A. Beyond the Lobby Day, I know that
 16 Yannis works almost full-time during the
 17 legislative -- well, he does work full-time
 18 during the legislative session contacting
 19 representatives and carry forth the mission.
 20 That's probably the extent of it.
 21 Q. What is the mission that you just
 22 referred to?
 23 A. Ensuring justice and equality for
 24 people of color and monitoring the bills and
 25 measures that are impacting our community.

1 A. It's sort of a combined effort of our
 2 State Conference president, myself and Yannis. I
 3 would say we were the three main players in
 4 orchestrating that.
 5 Q. Does the Texas NAACP hold a Lobby Day
 6 during every legislative session?
 7 A. I think we've done that fairly
 8 consistently.
 9 Q. Dating back as far as your involvement?
 10 A. I would -- not that far, but maybe at
 11 least for the last eight years.
 12 Q. Does the Texas NAACP, during the
 13 legislative session, hold any meetings at the
 14 capitol?
 15 A. Meetings at the capitol. . . During
 16 the Lobby Day?
 17 Q. Outside of Lobby Day.
 18 A. I'm sure that there are meetings that
 19 bleed out from, you know, the Lobby Day, like our
 20 health committee chair may have meetings with
 21 someone in the Department of Health or -- that
 22 are specific to something that's going on in the
 23 legislature. So, I mean, I couldn't say for
 24 certain, but I think I have heard of them having
 25 some meetings, but I don't know specifically.

	54		56
<p>1 Q. Does Mr. Banks or anyone on his behalf 2 meet specifically with individual legislators? 3 A. I'm pretty certain he would. 4 Q. Have you yourself ever provided 5 testimony regarding any bill during a legislative 6 session? 7 A. No. 8 Q. If the Texas NAACP were to offer 9 testimony at a legislative session, who would do 10 that? 11 A. It would depend on the legislation. 12 Q. Any kind of voter ID legislation? Who 13 would typically give testimony regarding such 14 legislation? 15 A. Probably Yannis. Gary, perhaps. Our 16 political action chair, Mr. Jefferson. 17 Q. What is his name? 18 A. Howard Jefferson. 19 Q. Howard Jefferson? 20 A. Um-hum. 21 Q. And he is the political action chair of 22 the Texas NAACP? 23 A. That's correct. 24 Q. And what is his job? What is the job 25 of -- what is a political action chair</p>		<p>1 What are the various standing committees? 2 A. I'm going to try to give you all of 3 them, but I can't promise you I'll come through 4 with all of them. I've had a lot of chemo. 5 Q. Give me as many as you can recall. 6 A. Okay. Political action. 7 Criminal justice. 8 Youth work. 9 ACT-SO. 10 Education. 11 Finance. 12 Communications. Let's see. What 13 else? 14 Housing. 15 Press and publicity. 16 Economic development. 17 That's just -- I can't think of any 18 others. I'm sure there are lots more. 19 Q. And those are standing committees 20 within the Texas NAACP? 21 A. Yes. 22 Q. Are you aware of any of those standing 23 committees conducting any kind of polls or 24 surveys of Texas NAACP members regarding voter ID 25 legislation?</p>	
<p>1 responsible for? 2 A. Political concerns impacting the 3 minority community and others. 4 Q. And what kind of activities does that 5 involve? 6 A. Well, obviously monitoring legislative 7 measures, providing guidance and programmatic 8 information or programmatic designs for the units 9 to implement. 10 Q. How long has that position existed? 11 A. I would think since the national 12 created it. The national office, you have to 13 understand, creates these standing committees. 14 It's done on our national board level. 15 Q. During the legislative session, does 16 the Texas NAACP conduct any kind of polls or 17 surveys of its members? 18 A. Regarding? 19 Q. Regarding legislation that might affect 20 the Texas NAACP? 21 A. I think that would be done within our 22 committees. We would not do it as a whole. I 23 think the committees, the standing committee 24 chairs. 25 Q. You mentioned the standing committees.</p>	55	<p>1 A. No personal knowledge of that. 2 Q. Can you tell me about the activities of 3 the Texas NAACP, specifically with regard to the 4 enactment of SB 14? 5 A. Okay. We did have a Lobby Day, and it 6 was discussed. The Bill itself was handed out. 7 We were given talking points so that when we go 8 to visit the different legislators that -- each 9 of our units are from all across the state, 10 they're statewide, so they have various and 11 different legislators. So they would go and 12 speak with them regarding supporting our 13 positions. 14 Q. Any other activities outside of Lobby 15 Day? 16 A. We would send out updates if there was 17 some movement and perhaps needed individuals to 18 talk with their legislators again. We would send 19 out information asking them to do that. 20 Q. With regard to any of the activities 21 that you've just described, does the Texas NAACP 22 coordinate with other groups such as MALC or the 23 Texas League of Young Voters? 24 A. I really have no knowledge of them 25 coordinating directly with those groups, and I've</p>	57

	58		60
<p>1 -- I've heard the names of the groups before, but 2 whether or not they're coordinating with them, I 3 have no know -- no direct knowledge of that. 4 Q. During the legislature that enacted SB 5 14 -- 6 A. Um-hum. 7 Q. -- are Texas NAACP members or members 8 of the branches encouraged to express their 9 concerns or any issues they have to the executive 10 committee or anyone else at the Texas NAACP? 11 A. Yes. 12 Q. And how would they do that? 13 A. Probably just e-mails. 14 Q. Do you read those e-mails? Or do you 15 compile those communications? 16 A. I -- unfortunately I cannot read every 17 e-mail that I get or I would never do anything 18 else. Things that are germane to specific 19 committee chairs, that information is usually 20 forwarded on to them for handling or whatever. 21 Q. But you do, to some extent, review 22 communications of members with the Texas NAACP; 23 is that correct? 24 A. I do see some of them, yes. I don't 25 see all of them. Please understand --</p>		<p>1 A. I would think a lot. I couldn't tell 2 you the exact amount. Just thinking of the 3 salary that we pay Yannis and his activities has 4 almost been exclusively dedicated to the 5 legislature and that was not the original intent 6 of his position. 7 Q. What was the original intent of his 8 position? 9 A. He would handle a large amount of 10 administrative work. We have a lot of civil 11 rights complaints that far exceeds legislative 12 concerns that need to be addressed almost on a 13 day-to-day basis. 14 Q. Are the resources expended towards 15 legislative activities? Are those -- is that 16 something that is budgeted for? 17 A. You know, you used that term before 18 about budget. I guess -- I guess the -- the -- 19 the reality of it is, our resources are not that 20 vast that we have an operational budget like, 21 say, maybe an AT&T or a 7-Eleven Southland 22 Corporation. 23 We expend our resources where 24 they're needed and it's more -- oftentimes it's 25 more reactive where budget sounds more proactive,</p>	
<p>1 Q. Sure. 2 A. -- that everybody knows who the 3 standing committee chairs are. If they have an 4 education issue, they know whom to contact. They 5 have -- we provide them with that information. 6 Q. Okay. Are you aware of any studies or 7 reports or analyses that were considered by the 8 Texas NAACP in their involvement or participation 9 in the enactment of SB 14? 10 A. No. 11 Q. Any studies or reports that any talking 12 points developed by the Texas NAACP were based 13 on? 14 A. I'm not sure. I do not develop -- I 15 did not develop the talking points, so I couldn't 16 say what they use to create them. 17 Q. Who did develop the talking points? 18 A. I would think -- I would think maybe 19 Yannis. Political action chair. 20 Q. Mr. Jefferson? 21 A. Yeah, Mr. Jefferson. 22 Q. What kind of -- what kind of resources 23 of the Texas NAACP are spent on activities such 24 as Lobby Day or any other kind of 25 legislative-related activities?</p>	59	<p>1 in my mind, that people can sit down and say, 2 we're going to spend \$500 for educational 3 concerns and 500 -- no. We don't do that. We 4 don't compartmentalize like that. 5 Q. So the Texas NAACP -- let me ask you: 6 Does the Texas NAACP compile an annual budget 7 every year? 8 A. Our treasurer will put together 9 something. But to be quite honest with you, as 10 far as actually -- I mean, we have certain 11 dollars that are set aside for certain purposes. 12 Example, we have a historical project going on -- 13 Q. Um-hum. 14 A. -- and we have a certain dollar amount 15 that has been designated for that. We have a 16 certain dollar amount for youth and college, and 17 we do not veer into those lanes because we have 18 those set aside for them. But the rest of the 19 dollars are just basically operating funds. 20 Q. And are those operating funds allocated 21 as on a need basis? You mentioned where they're 22 needed -- 23 A. Um-hum. 24 Q. -- are they allocated when and where 25 they're needed?</p>	61

62

1 A. That's pretty much it.
 2 Q. And who makes those decisions?
 3 A. Our executive committee.
 4 Q. Is that a similar voting approval
 5 process?
 6 A. Yes.
 7 Q. Does the National NAACP have any input
 8 into the allocation of funds at the state level?
 9 A. No.
 10 MR. TATUM: Could we go off record.
 11 (A recess was taken.)
 12 MR. TATUM: All right. Let's go
 13 back on the record.
 14 Q. (BY MR. TATUM) All right. Miss Lydia,
 15 we were talking about operational funds which you
 16 stated were specifically designated for certain
 17 purposes, and you don't -- I believe you said you
 18 don't veer into those roads; is that correct?
 19 A. Um-hum.
 20 Q. Okay. And you mentioned other funds of
 21 the Texas NAACP that are allocated on an
 22 as-needed basis --
 23 A. Um-hum.
 24 Q. -- is that a correct summarization of
 25 what your testimony was?

64

1 were needed to address it?
 2 A. Definitely. Our national president
 3 actually came down for that event.
 4 Q. Was a similar decision made regarding
 5 addressing SB 14?
 6 A. Yes, I think I've already stated that,
 7 that it was approved and we had to redirect
 8 resources to address this because of the
 9 egregious nature of the bill.
 10 Q. Did the national president come down
 11 for that decision?
 12 A. I know he was involved in some of it,
 13 perhaps. And I'm not certain of that. Let me
 14 just back out of that.
 15 Q. What kind of things does the executive
 16 committee look at when deciding if and how -- or
 17 if and what percentage of funds should be
 18 allocated towards addressing a specific need like
 19 SB 14?
 20 A. I'm not going to say that they
 21 specifically say a dollar amount, but they
 22 approve the resources for us to move forward with
 23 trying to address what they consider as something
 24 that would be punitive to our community, whether
 25 it's with education, or whether it's with

63

65

1 A. Yes.
 2 Q. Okay. Do these as-needed funds, are
 3 those allocated in such a manner during every
 4 year? Is that something that occurs every year
 5 or is that something if there's no pressing need
 6 you don't allocate anything for a specific need?
 7 Does that make sense?
 8 A. Yeah, that makes sense. Yes. And no.
 9 Example, when the issue of changing the textbooks
 10 in Texas came up, funds were shifted to the
 11 education committee so that they could conduct
 12 needed activities to advocate in the interest of
 13 our membership -- or I should say their
 14 membership.
 15 Q. Do you recall when that textbook issue
 16 was?
 17 A. I honestly have the worst things with
 18 numbers. That's the part that the chemo took
 19 out. I really don't know. I have the hardest
 20 time remembering that, but I do remember
 21 attending the session or a couple of sessions in
 22 Austin regarding that.
 23 Q. And regarding that issue, was it the
 24 decision of the executive committee in response
 25 to that issue to divert whatever amount of funds

1 political action or health issues. It varies.
 2 Q. And did that decision-making process
 3 vary from previous allocations of resources and
 4 response to other issues like the Texas
 5 schoolbook/textbook issue that you mentioned
 6 before?
 7 A. I'm not sure I understand your
 8 question. I'm sorry.
 9 Q. Sure.
 10 You mentioned that a decision was
 11 made to allocate specific resources to address
 12 the schoolbook issue, correct?
 13 A. Um-hum.
 14 Q. Okay. Was the process that led to that
 15 allocation, was that generally the same kind of
 16 process that led to the allocation of resources
 17 to address SB 14-related issues?
 18 A. Yes.
 19 Q. Okay. Going back to the legislative
 20 process that led to the enactment of SB 14, does
 21 the Texas NAACP contend that SB 14 was enacted
 22 through a process marked by departures from
 23 normal legislative procedures?
 24 A. I think that was -- that was a -- yes.
 25 I would say yes to that.

66

1 Q. Can you tell me in what ways the
 2 legislature diverted from normal procedures in
 3 the enactment of SB 14?

4 A. Well, rules were changed for passage by
 5 the legislators.

6 Q. Do you know what specific rules were
 7 changed?

8 A. If I'm not mistaken, it was from
 9 two-thirds to just a simple majority vote was
 10 changed in order to enact it.

11 I think the process for fast-pacing
 12 the bill, the way it was handled in committee, a
 13 special committee was formulated specifically.

14 I think there were a number of
 15 things that were done to ensure the passage of
 16 that bill.

17 Q. Were any of these things -- and by
 18 "things," I believe you mean the --

19 A. Measures.

20 Q. -- measures, rule changes, procedural
 21 changes, were any of those -- were any of those
 22 things done outside, in your opinion -- let me --
 23 let me back out.

24 Does the Texas NAACP contend that
 25 the legislature in enacting SB 14 acted out of

68

1 recommendations that could perhaps be used to
 2 amend the scope of this bill. I know there were
 3 other people who were interested in speaking, but
 4 due to time constraints, it didn't happen.

5 Q. Does the Texas NAACP feel that its
 6 voice was not adequately heard concerning SB 14?

7 A. I think the better answer would be,
 8 your question, do we feel that our
 9 recommendations were not listened to?

10 Q. Did you have ample opportunity to
 11 present your recommendations?

12 A. You know, that takes us down a long
 13 road when you ask that question, because like
 14 myself, I am a volunteer. I am losing income as
 15 I sit here today. And all of our people who are
 16 in our units, whether they're branch presidents
 17 or whatever capacity they may hold, they are all
 18 volunteers. And so the process of supporting
 19 yourself and your family does not always allow
 20 you the leisure of going to Austin and waiting
 21 for days, perhaps, to voice your concern.

22 We have, you know, obviously tried
 23 to assist people in getting to Austin to provide
 24 testimony and we have been successful in some --
 25 with some -- the process of getting them there

67

69

1 its permissible authority?

2 A. Not knowing exactly what is permissible
 3 and not permissible, but I know that there were
 4 some changes that were put in place that would
 5 absolutely guarantee the passage.

6 Q. Does the Texas NAACP contend that those
 7 changes were -- or does the Texas NAACP contend
 8 that the legislature was not authorized to make
 9 those changes?

10 A. No, I don't think that that is the
 11 contention.

12 Q. Do you recall -- outside of SB 14, do
 13 you recall any other bill for which similar
 14 changes were made by the legislature?

15 A. Not to my knowledge.

16 Q. Did the Texas NAACP have the
 17 opportunity to voice its concerns with SB 14 to
 18 the legislature during that legislative session
 19 and --

20 A. I do --

21 Q. Sorry. And I'm referring to the 2011
 22 legislature.

23 A. I would venture to say that we only had
 24 maybe one or two people who actually had an
 25 opportunity to speak opposing or even providing

1 and having them to provide testimony, not
 2 necessarily that they were successful in changing
 3 the outcome of the pending legislation, but I'm
 4 not sure, the short answer I guess is. I'm not
 5 sure if our voices were heard in its entirety or
 6 not.

7 Q. Would you say that based on the
 8 inherent nature of the Texas NAACP, they face --
 9 you face certain challenges in getting your
 10 message out and voice heard regarding specific
 11 bills being proposed in the legislature?

12 A. I think we do have some challenges,
 13 yes.

14 Q. And those challenges include kind of
 15 what you were just talking about with regard to
 16 getting volunteers mobilized and getting people
 17 to the capitol and that kind of thing, correct?

18 A. Exactly.

19 Q. Okay. Do you believe that SB 14 is the
 20 cause of some of those challenges that y'all
 21 face?

22 A. Challenges in voting or I mean --

23 Q. I'm talk -- I'm talking about the
 24 legislature, getting your voice -- participating
 25 in the legislative process. You mentioned

70

1 earlier that the Texas NAACP faces certain
 2 challenges in getting people to the capitol to
 3 testify and voice concerns about various bills;
 4 is that correct?

5 A. Yes.

6 Q. Okay. Are those -- do those challenges
 7 always exist?

8 MS. RUDD: Objection; vague.

9 A. I'm not sure that I could answer that,
 10 because we're involved in so many different
 11 things as it relates to civil rights and this is
 12 just one component.

13 Q. (BY MR. TATUM) Okay. Did anyone at
 14 the Texas NAACP provide live testimony to the
 15 legislature regarding SB 14?

16 A. I'm certain, yes.

17 Q. During that live testimony, were any
 18 studies or data presented regarding the impact of
 19 SB 14?

20 A. I really don't know. I wasn't there,
 21 nor do I have the transcript of the proceedings.

22 Q. Do you recall any kind of meetings that
 23 were held to prepare for that live testimony?

24 A. I have no knowledge of that.

25 Q. Moving on to a different topic.

1 A. That not only were you getting someone
 2 to fill out a voter registration card, you were
 3 also giving them information about SB 4 -- 14
 4 telling them, you know, that you need to make
 5 certain that the name on this voter registration
 6 card that you're filling out matches the name
 7 that's on your pictured ID identically, otherwise
 8 you may be denied the right to vote, so there was
 9 a lot more -- education normally came after the
 10 registration project. Notice I said voter
 11 registration, voter education, these are
 12 compartmentalized.

13 Q. Um-hum.

14 A. But voter registration and education
 15 became one at this point because of the nature of
 16 SB 14.

17 Q. So --

18 A. I'm sorry. In the new law.

19 Q. So previously there was a -- there was
 20 one compartment within the organization of the
 21 Texas NAACP for voter registration purposes?

22 A. Um-hum.

23 Q. There was a separate compartment for
 24 voter education purposes; is that correct?

25 A. Yes, sir.

71

1 A. Okay.

2 Q. Does the Texas NAACP engage in any
 3 activities related to voter registration?

4 A. Definitely.

5 Q. And what activities are those?

6 A. We conduct voter registration drives.

7 We have a complete voter empowerment initiative
 8 that includes voter registration, education,
 9 mobilization and voter protection. Those are the
 10 four components and this is something that we
 11 have had to really work a lot harder at, so to
 12 speak, because of the changes in the law
 13 regarding voting with the voter ID bill.

14 We had to ensure that people were,
 15 one, aware that this had taken place, and we
 16 wanted our units to please educate their
 17 communities that this bill had become law, and
 18 that there were certain things that must be done
 19 that were different from what we had done
 20 previously in order for people to vote.

21 Q. Specifically with regard to voter
 22 registration --

23 A. Um-hum.

24 Q. -- in what way did SB 14 change the
 25 activities of the Texas NAACP?

1 Q. And is it your testimony that because
 2 of SB 14, those two compartments, as you describe
 3 them, have been merged into one?

4 A. They've been merged into one and we
 5 still have an education component, but
 6 registration education -- well, it is now
 7 registration education, then it's another
 8 component of education still, okay, that involves
 9 issues that we need to be looking out for and --
 10 you know, and there is the mobilization,
 11 encouraging people to get out and vote, providing
 12 them with information about where their voting
 13 locations are, and then we always have a voter
 14 complaint hotline that we operate with attorneys
 15 or through the national office to address voter
 16 concerns during election.

17 Q. To address voting concerns during any
 18 election?

19 A. Um-hum, any election.

20 Q. How long has the Texas NAACP been
 21 engaging in voter-registration-type activities?

22 A. Since its inception.

23 Q. Is that something the Texas NAACP has
 24 always done?

25 A. Yes, sir.

73

74

1 Q. Okay. And when you say -- when you're
 2 talking about how it was previously just voter
 3 registration and now it's voter registration
 4 education --

5 A. Um-hum.

6 Q. -- what additional resources are
 7 committed to the new compartment described as
 8 voter registration education?

9 A. We had to provide printed material
 10 about the changes. It's -- and obviously we were
 11 instructing people, you know, that when you fill
 12 out your voter registration card, make sure you
 13 pull out your pictured ID that you're going to be
 14 using, if you have one, that it matches that card
 15 because of the discretionary power that a -- that
 16 an election official has when it comes time to
 17 vote.

18 If it does not match exactly, they
 19 can decide that you're not the person that you
 20 say you are or that your identifications, one or
 21 the other, does not say -- says you are and you
 22 could possibly be disqualified or be given a
 23 provisional ballot which may or may not count,
 24 depending on your actions later.

25 Q. Are the resources that are dedicated to

76

1 have been added to the pot, so to speak.

2 Q. How has the Texas NAACP -- in the past,
 3 prior to SB 14, how has the Texas NAACP allocated
 4 resources to educate its members regarding other
 5 changes to voter laws?

6 A. We've created postcards about when the
 7 State enacted re-enfranchisement for felons who
 8 were off paper. That was a piece that we would
 9 hand out with voter registration cards to let
 10 people know if they or family members were off
 11 paper, no longer reporting to a probation or
 12 parole officer, that they were now entitled to
 13 vote again, so we created documents for that.

14 Q. So -- sorry.

15 A. That's okay. Go ahead.

16 Q. So did that process involve allocating
 17 resources for making printouts and handouts and
 18 fliers?

19 A. Yeah. We had -- we had a card, I just
 20 told you. We created a card with another group
 21 --

22 Q. Um-hum.

23 A. -- that we handed out with voter
 24 registration cards just so that people were aware
 25 of the law. Anytime you have any legislative

75

77

1 voter registration/education, do those fall under
 2 the category of set operating funds or the
 3 as-needed funds that you were referring to
 4 earlier?

5 A. Definitely going to be the as-needed
 6 funds as a result of SB 14.

7 Q. So before SB 14 funds allocated for
 8 registration activities, were those considered
 9 operating funds?

10 A. I would think so. They're -- they're
 11 -- they're both -- it all comes out of the
 12 operating funds. Okay? I just think it's
 13 required more effort and more financial resources
 14 for printed material, voter registration has
 15 become more of an education process, whereas
 16 before it was just making certain that people
 17 wrote legibly so that somebody could read the
 18 registration card.

19 Now you're dealing with telling
 20 people and providing them with information about
 21 SB 14, where they can go and get an EIC, you
 22 know, the fact that they need a birth
 23 certificate, where you can go to get a birth
 24 certificate if you need that for, you know, EICs
 25 or whatever, so there are a number of pieces that

1 changes we try to educate our community about
 2 those legislative changes.

3 Q. And so the education of your members
 4 regarding SB 14 is not the first time you've had
 5 to educate your members regarding a change in
 6 voter laws; is that correct?

7 A. No. But this is the most extensive
 8 change we've ever had to make.

9 Q. And other than the printouts and the
 10 new compartment that you already mentioned, in
 11 what ways has the education of your members
 12 regarding SB 14 been more extensive than with
 13 previous changes in the law?

14 A. We have obviously been involved in this
 15 litigation now for -- this was filed in, what,
 16 2013, and during the legislative session, again
 17 we were very actively involved in lobbying and
 18 advocating against this bill. We have had to
 19 do -- we have developed resources that we have
 20 provided to our branches to hand out to people
 21 during the registration process. We've had to
 22 create information on where you can go and when
 23 you can go and where the closest DPS office is,
 24 the hours the DPS offices are open.

25 There is a whole plethora of things

78

1 that have come about as a result of this bill
 2 that we've never encountered on such a lengthy --
 3 for such a lengthy period of time, because the
 4 learning curve is still going on. We still have
 5 people who show up to vote who do not realize
 6 that they need these documents. Students don't
 7 understand why a state-issued student ID is not
 8 sufficient [sic] to vote when it's initiated by
 9 the State as well.

10 Q. And so are these resources you're
 11 allocating towards SB 14-related issues, that
 12 includes resources dedicated to the ongoing
 13 litigation of this lawsuit, correct?

14 A. Yes.

15 Q. Going back to you were talking about --
 16 talking about funds, financial resources of the
 17 Texas NAACP, and you mentioned -- and correct me
 18 if I'm misstating any of this -- you mentioned
 19 funds that are kind of set at the beginning of
 20 the year that you don't touch. Have -- because
 21 of SB 14, have you had to -- for lack of a better
 22 word -- eat into any of those fund allocations?

23 A. No.

24 Q. Can you tell me what activities,
 25 outreach activities, programming activities, any

80

1 Q. Now, I didn't mention this earlier,
 2 when we talk about members, members are not --
 3 card-carrying members of the Texas NAACP are not
 4 the only people that the Texas NAACP serves; is
 5 that correct?

6 A. I'm sure there are lots of people who
 7 would benefit, I would venture to say, from the
 8 work of our association and I think that has --
 9 that has history as well.

10 Q. So would you say that the Texas NAACP
 11 has a constituent base that are not necessarily
 12 members?

13 A. Yeah.

14 Q. Okay.

15 A. I would say that.

16 Q. Sorry. I should have clarified that
 17 earlier.

18 Now, how specifically -- with
 19 regard to educating its members regarding voting
 20 laws, how specifically does the Texas NAACP
 21 accomplish that purpose?

22 A. We provide them with updates on
 23 legislature such as this. We send out
 24 information regarding any irregularities or
 25 things that have changed that would impact the

79

81

1 kind of activity of the NAA- -- of the Texas
 2 NAACP that it has -- that it usually conducts in
 3 any given year. Can you give me examples of such
 4 activities that have been allocated less
 5 resources as a direct result of SB 14?

6 A. The utilization of Yannis Banks, our
 7 one staff person, that has almost been -- I would
 8 say he's gone from being in a position that was
 9 60 percent administrative and he's now doing
 10 probably 80 percent legislative as a result of
 11 this bill.

12 Q. He was doing 60 percent administrative?

13 A. Um-hum. But he's no longer doing that
 14 because he doesn't have the time.

15 Q. Could the Texas NAACP hire someone else
 16 to make up for that lost time?

17 A. No. We can't afford that. Our pockets
 18 are not that deep.

19 Q. Okay. You mentioned voter ID
 20 education --

21 A. Um-hum.

22 Q. -- how long has the Texas NAACP been
 23 educating its members regarding voter
 24 requirements -- regarding voter laws in general?

25 A. Since its inception.

1 voting in their specific cities.

2 Q. Do you hold any kind of workshops?
 3 A. During our annual convention and we
 4 definitely -- and we have actually, I guess,
 5 spent a great deal of time during the last
 6 convention dealing with this particular deal and
 7 the impact that it would have in our community
 8 and the things that we need to do, sort of a
 9 mobilization effort on the part of the units to
 10 implement different activities to educate our
 11 community.

12 Q. And the state convention, is that an
 13 annual event?

14 A. That is.

15 Q. Okay. When is it normally held?

16 A. The first or second weekend in October,
 17 annually.

18 Q. And does it occur in different
 19 locations across the state?

20 A. Absolutely.

21 Q. Do you remember where the last one was?

22 A. In Richardson.

23 Q. That would have been October 2013?

24 A. That's correct.

25 Q. Okay. And at that state convention,

<p>1 were workshops held meant to educate members 2 regarding the requirements of SB 2014? 3 A. Yes. 4 Q. Were workshops held for any other 5 purpose? 6 A. There were some other purpose, but the 7 majority of it was on SB 14. 8 Q. Do you recall where the state 9 convention was held in 2012? 10 A. Yes. 11 Q. And where was that? 12 A. Corpus Christi. 13 Q. And at the state convention in Corpus 14 Christi, were workshops held for the purpose of 15 educating Texas NAACP members regarding SB 14? 16 A. If I'm not -- if I'm not incorrect, I 17 don't think the bill had been passed, but I think 18 it had been -- I want to say that the enactment 19 of it had been delayed at that time. There was, 20 I'm sure, discussion about it, but I think there 21 had been some intervention. 22 Q. For clarification purposes, I'll 23 represent to you that the bill became effective 24 January 1st, 2012, and it was the subject of 25 litigation involving the preclearance process.</p>	<p>82</p> <p>1 A. Between 500 to 1,000. 2 Q. At these state conventions, do y'all 3 assist members with registering to vote or 4 obtaining forms of ID required to vote? 5 A. We actually considered it at the 6 Richardson convention -- 7 Q. Um-hum. 8 A. -- but again, it was a weekend and DPS 9 is not operational on Saturdays or weekends. 10 Q. During those workshops, you educate 11 your members regarding the requirements of SB 14? 12 A. Yes, we do. And also, you know, the 13 ancillary things that -- like information on DPS 14 offices, the locations, the distances. We had a 15 number of counties that didn't even have a DPS 16 office. So, I mean, we would address and try to 17 deal with some of those concerns. 18 Q. At the 2013 conference in Richardson, 19 for example -- 20 A. Um-hum. 21 Q. -- does the Texas NAACP feel it had the 22 necessary resources to hold an effective 23 workshop? 24 A. Yeah, I think we had the resources, but 25 we didn't have the ability to issue documents</p>
<p>1 A. Um-hum. 2 Q. And that litigation was resolved -- 3 MR. TATUM: And, Amy, correct me if 4 I'm wrong. 5 Q. (BY MR. TATUM) -- in the summer 6 of 2012, I believe. 7 MS. RUDD: (Witness nodded head.) 8 Q. (BY MR. TATUM) Just for edification 9 purposes. 10 A. Thank you. Well, then I'm -- okay. 11 Q. So getting back to the 2012 state 12 conference held in Corpus -- 13 A. Um-hum. 14 Q. -- I'm sorry if I'm repeating the 15 question, but do you recall any workshops held 16 during that conference specifically to educate 17 members regarding the requirements of SB 14? 18 A. Yes. 19 Q. And what does such a workshop entail? 20 What kind of thing goes on those workshops? 21 A. Legislators perhaps will come in and 22 speak. Attorneys who would discuss the bill and 23 the impact that it would have and remedies. 24 Q. Do you know how many people attend 25 these state conventions, generally?</p>	<p>83</p> <p>1 that would be needed to actually enable someone 2 to vote if they did not have identification. 3 Q. Who sets the agenda for the state 4 conventions? 5 A. It's a collaboration between our state 6 conference president and the standing committee 7 chairs. 8 Q. Do you recall where the state 9 conference was held in 2011? 10 A. I think it was Austin. 11 Q. At that convention were workshops held 12 to educate members about the requirements of SB 13 14? 14 A. If it was pending legislation, I'm 15 sure. We always have a legislative session that 16 deals with pending bills that will impact our 17 community. 18 Q. Okay. So would you say that going back 19 to state conventions ten years ago, would you say 20 that at every one of those state conventions 21 there was some kind of workshop for the purpose 22 of educating members regarding voter laws? 23 A. Not consistent. I wouldn't think so 24 because we haven't had that many changes. Beyond 25 the re-enfranchisement, I can't think of anything</p>

86

1 else that we actually expended time or money to
 2 educate our community on. No, I can't think of
 3 anything.

4 Q. Were workshops held during those
 5 conventions where voter ID laws weren't discussed
 6 or weren't the subject of workshops, were
 7 workshops held for other purposes?

8 A. Yeah, we have workshops for a number of
 9 different purposes, but not necessarily for were
 10 we addressing voter education registration or any
 11 of those issues because there were no real issues
 12 at that time.

13 Q. So every year is there some kind of
 14 process or some kind of meeting where the topics
 15 for the workshops to be held at the state
 16 convention are discussed and decided upon?

17 A. Yes.

18 Q. Okay. And the workshops, do they
 19 change from year to year based on pressing needs
 20 or matters?

21 A. They change from year to year. For the
 22 most part, they're usually involved with branch
 23 operations, procedure from the national that may
 24 have changed. That has been the majority, until
 25 the last few years, of what our workshops

88

1 A. Yes, that's correct.

2 Q. Do you know if those kinds of documents
 3 have been produced in this litigation?

4 A. I have no idea.

5 Q. Okay. Does the Texas NAACP assist
 6 voters during elections?

7 A. I'm not sure I understand exactly what
 8 you mean by "assist" them.

9 Q. Does the Texas NAACP engage in any
 10 activities that assist its members or
 11 constituents in the voting process?

12 A. As far as going into a voting booth and
 13 voting? I mean, I'm still not sure.

14 Q. Well, no, that would be illegal.

15 A. Yeah, that's what I'm sitting here
 16 thinking. It's like, God no.

17 Q. Okay. I guess what I'm talking about,
 18 do they assist people in getting to voting
 19 places?

20 A. Oh, you mean like rides to the polls?

21 Q. Sure.

22 A. Yeah, we -- we do that.

23 Q. How long has the Texas NAACP been doing
 24 that kind of thing?

25 A. Again, probably since its inception.

87

1 consisted of. Quite honestly, the workshop in
 2 Richardson, and I'm saying this because I
 3 actually did have a member to say this. It was
 4 almost exclusively on this legislation and the
 5 impact it was going to have and the importance of
 6 what we needed to do to ensure the rights of
 7 people to vote.

8 Q. These kinds of workshops and
 9 educational activities that the Texas NAACP
 10 engages in, do they occur outside of the state
 11 conventions; in other words, are there -- do they
 12 hold these kind of workshops in any other kind of
 13 forum or gathering?

14 A. No, our units would do that.

15 Q. The local branches would do that on
 16 their own?

17 A. With their membership.

18 Q. And are you aware that they hold such
 19 -- that they indeed have held such workshops at
 20 the local level?

21 A. Some of them have, I'm sure.

22 Q. For these state conventions, are there
 23 mass communications sent out to the membership,
 24 mailers, e-mails, that kind of thing, to let them
 25 know about the agenda?

89

1 Q. Do they perform any kind of -- any
 2 other kind of assistive functions for early
 3 voting, absentee voting, does that apply to all
 4 phases of the voting process?

5 A. I would think -- early voting in Texas,
 6 we try to encourage our membership to do early
 7 voting because of the simplicity of it or they
 8 can go anywhere in the county and vote versus
 9 having to show up at an assigned precinct to vote
 10 during the regularly scheduled election. So we
 11 do that for sure.

12 We have Super Sundays where our
 13 churches -- we join with our churches to try to
 14 help get people to go to the polls after
 15 services. We definitely want to impact voter
 16 turnout and that has been consistent.

17 Q. What kinds of resources does the Texas
 18 NAACP expend towards these kinds of
 19 voter-assistance activities that you've talked
 20 about?

21 A. I'm not sure of an exact amount. I
 22 don't think I could give you that.

23 Q. Does the Texas NAACP employ the use
 24 of volunteers for these kinds of purposes?

25 A. For the most part, it's strictly

<p>1 volunteer.</p> <p>2 Q. As part of the assistance that Texas 3 NAACP provides to voters, does that include 4 helping voters gather the necessary documentation 5 to vote?</p> <p>6 A. Some of our units may have. I'm not -- 7 I'm not personally familiar with anyone who has 8 one of the units that has done something like 9 that. I'm not really for sure. But I know we 10 have encouraged them to assist their constituents 11 to -- to get the materials needed -- the 12 documents needed, whether it's a driver's license 13 or whether it's their birth certificate.</p> <p>14 Q. In the election cycles that have 15 occurred after the implementation of SB 14 --</p> <p>16 A. Um-hum.</p> <p>17 Q. -- has Texas NAACP assisted voters 18 during those elections in the manner that you've 19 just described?</p> <p>20 A. I'm sure we have.</p> <p>21 Q. Did those activities require more or 22 less resources than for previous elections prior 23 to SB 14?</p> <p>24 A. Definitely more.</p> <p>25 Q. In what way?</p>	<p>90</p> <p>1 recruitment, now as part of their membership 2 recruitment events, they do provide information, 3 and they always have the registration cards, but 4 they now also have to provide -- they provide 5 information about SB 14 and the requirements of 6 that as a prerequisite to vote.</p> <p>7 Q. Has the Texas NAACP in any way been 8 unable to fulfill its stated mission as a result 9 of SB 14?</p> <p>10 A. No. I'd like to think that we're still 11 carrying out the mission of the NAACP. Maybe not 12 to the extent that we have done previously 13 because of the allocations of whether it's 14 manpower or dollars to this particular effort.</p> <p>15 I think we could have done more 16 with -- this is just my personal leaning now. I 17 think we could have done more with resources to 18 give to students for scholarships, as we have 19 done in the past, and other youth-related 20 activities.</p> <p>21 Q. Are resources dedicated to scholarships 22 and youth-related activities, are those allocated 23 on an as-needed basis?</p> <p>24 A. Well, they were part of our 25 programmatic efforts. We felt they were</p>
<p>1 A. You have to have a -- you have to have 2 a birth certificate to get a driver's license. 3 You have to have a birth certificate to get an 4 EIC. I mean, those are all needed to move 5 forward in the process of getting identification.</p> <p>6 Q. But in the Texas NAACP's activities 7 related to assisting voters --</p> <p>8 A. Um-hum.</p> <p>9 Q. -- to vote --</p> <p>10 A. Okay.</p> <p>11 Q. -- have they expended more or less 12 resources for those activities as a result of SB 13 14?</p> <p>14 A. More.</p> <p>15 Q. In what way?</p> <p>16 A. Resources getting people to and from 17 sites, I'm sure were expended by some of our 18 units, where they need to get to DPS offices. 19 We've had Yannis who has been working exclusively 20 on this effort. That has definitely increased 21 our expenditure. Printing of material, 22 informational events to educate the community. 23 What else? Just a number of different 24 activities. Example that comes to mind, I know 25 some of the units who usually just do membership</p>	<p>91</p> <p>1 important parts of it.</p> <p>2 Q. But those kinds of resources are not 3 included in the set operating funds that you 4 discussed earlier?</p> <p>5 A. No, they were not a part of those 6 dedicated funds, no. They came out of the 7 operating fund.</p> <p>8 Q. Okay. So I guess that's a better way 9 to -- I've been calling them operating funds this 10 whole time. There are dedicated funds and then 11 there are operating funds?</p> <p>12 A. (Witness nodded head.)</p> <p>13 Q. Dedicated funds are set -- there's a 14 set amount --</p> <p>15 A. Um-hum.</p> <p>16 Q. -- that are dedicated for that, and 17 then operating funds, those are the ones that are 18 allocated on an as-needed basis?</p> <p>19 A. Yeah, discretionary.</p> <p>20 Q. Okay. So just a recap. Has SB 14 --</p> <p>21 have the requirements of SB 14 impacted the 22 allocation of dedicated funds?</p> <p>23 A. No. Not of dedicated.</p> <p>24 Q. Okay. Outside of legislative 25 activities, outside of registration activities,</p>

<p>1 outside of voting activities -- I'm sorry, 2 outside of educational activities -- basically 3 outside from what we've already talked about with 4 regard to SB 14, what other kinds of activities 5 has the Texas NAACP engaged in with regard to SB 6 14?</p> <p>7 A. Okay. Other than the litigation that 8 we're involved in, the education of our 9 community, I can't think of anything else.</p> <p>10 (Deposition Exhibit Number 3 was 11 marked for identification.)</p> <p>12 Q. (BY MR. TATUM) Ms. Lydia, I'm handing 13 you what's been marked as Exhibit 3.</p> <p>14 A. Um-hum.</p> <p>15 Q. Ms. Lydia, do you recognize this 16 document?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. I represent to you that this 19 document has been produced to the defendants in 20 this litigation.</p> <p>21 A. Um-hum.</p> <p>22 Q. Is this document representative of an 23 e-mail that you sent to -- or an e-mail exchange 24 between you and a Gillian Parrillo?</p> <p>25 A. Um-hum.</p>	<p>94</p> <p>1 involved as a presenter. And if you recall, I 2 did say that we did have presenters who came in 3 to discuss.</p> <p>4 Q. Does Mr. Parrillo work for the TCET?</p> <p>5 A. I'm really am not sure. I would think 6 he does, based on this e-mail.</p> <p>7 Q. It mentions further down in the e-mail, 8 he says, "We are planning three more voter ID 9 seminars."</p> <p>10 A. Um-hum.</p> <p>11 Q. Are you familiar with those seminars?</p> <p>12 A. I never attended one of them.</p> <p>13 Q. Do you recall when they were?</p> <p>14 A. No, I do not.</p> <p>15 Q. Do you recall what they involved?</p> <p>16 A. No, I do not.</p> <p>17 Q. Were those seminars held by the TCET 18 and not the Texas NAACP?</p> <p>19 A. I have no idea.</p> <p>20 Q. Okay. So you don't have any knowledge 21 of what these voter ID seminars he's referring to 22 are?</p> <p>23 A. No, not at all.</p> <p>24 Q. And the line below that he mentions 25 virtual phone banks, do you have any knowledge</p>
<p>95</p> <p>1 MS. RUDD: You have to say yes. 2 MR. TATUM: You have to say yes.</p> <p>3 A. Yes. I'm sorry.</p> <p>4 Q. (BY MR. TATUM) Thank you.</p> <p>5 And is that dated October 2nd, 6 2013?</p> <p>7 A. That's correct.</p> <p>8 Q. Okay. At the bottom of this page, it 9 says here, from Gillian Parrillo, "I will be 10 sending you hopefully before the end of the week 11 a draft plan of TCET for voter ID work in 2013 12 and 2014." Is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. What is TCET?</p> <p>15 A. I'm not really sure.</p> <p>16 Q. You don't know what the --</p> <p>17 A. Oh, it's the organization. The Texas 18 Civic Engagement Table.</p> <p>19 Q. The Texas Civic Engagement Table?</p> <p>20 A. Um-hum.</p> <p>21 Q. Is that an organization that the Texas 22 NAACP regularly interacts with?</p> <p>23 A. I don't recall having interacted with 24 Mr. Parrillo before. This was in preparation 25 for our state convention and he was probably</p>	<p>95</p> <p>1 about -- of what those are about?</p> <p>2 A. No.</p> <p>3 Q. Does the Texas NAACP ever conduct any 4 kind of phone bank activity?</p> <p>5 A. I think the national has a system that 6 they may utilize.</p> <p>7 Q. Does the Texas NAACP ever utilize a 8 phone bank?</p> <p>9 A. I think we are allowed the utilization 10 of the one that national has to send recorded 11 messages to people regarding get out to vote.</p> <p>12 Q. To your knowledge, has the Texas NAACP 13 ever used that service that the --</p> <p>14 A. Yes.</p> <p>15 Q. For what purposes have they used it?</p> <p>16 A. Probably trying to get people out to 17 vote. Just encouraging people to go out and 18 vote.</p> <p>19 Q. Have they ever used it to -- for any 20 purpose directly related to SB 14?</p> <p>21 A. I'm not sure of that. I sort of sensed 22 that's where you were going, but I really don't 23 remember --</p> <p>24 Q. Okay.</p> <p>25 A. -- to be honest.</p>

98

1 Q. At the very bottom of this same page,
 2 it says, "Dallas County elections reaching out to
 3 voters identified as not having ID."

4 A. Um-hum.

5 Q. Is that a correct reading of that
 6 sentence?

7 A. Yes.

8 Q. What is he -- this is still in the
 9 e-mail from Mr. Parrillo, what is he referring to
 10 there?

11 MS. RUDD: Objection; calls for
 12 speculation.

13 A. I have no idea.

14 Q. (BY MR. TATUM) Do you have any
 15 knowledge regarding voters identified as having
 16 not ID referenced in that statement?

17 A. No, I don't. Sorry.

18 Q. Do you know who was -- who was reaching
 19 out to voters identified as not having ID in that
 20 statement?

21 A. It says Dallas County elections. I
 22 really don't know who at the Dallas County
 23 elections would have been doing that.

24 Q. Okay.

25

100

1 illustrated here?

2 A. Yeah, basically we were trying to find
 3 out if there was a standard from county to county
 4 as to how they are addressing the voter ID
 5 measure.

6 Q. And how did the Texas NAACP go about
 7 making that determination?

8 A. Just input from various people from
 9 across the state.

10 Q. So this e-mail is seeking input on that
 11 issue from those e-mail addresses included in
 12 that list?

13 A. Yes, uh-huh.

14 Q. Okay. On the next page there is a
 15 paragraph there that starts with, "No one tried
 16 to scan my driver's license." Do you see that?

17 A. Um-hum.

18 Q. Did you write that paragraph?

19 A. Yes. Um-hum.

20 Q. Can you tell me a little bit more about
 21 the events that are depicted or described in that
 22 paragraph?

23 A. Yes. I think if you go back to the
 24 first page where it indicates that Phyllis
 25 indicated that they attempted to scan her

99

101

1 (Deposition Exhibit Number 4 was
 2 marked for identification.)

3 Q. (BY MR. TATUM) Ms. Lydia, I'm handing
 4 you a document marked as Exhibit 4.

5 A. Okay.

6 Q. Ms. Lydia, I represent to you that this
 7 document has been produced to the defendants in
 8 this litigation. Do you recognize this document?

9 A. Yes.

10 Q. What is this document?

11 A. This is an e-mail that was sent out to
 12 the branch presidents.

13 Q. So everyone in that list is a branch
 14 president; is that correct?

15 A. For the most part. There may be some
 16 that are not.

17 Q. Okay. But there are branch presidents
 18 included in that list of e-mail addresses?

19 A. Yes, sir.

20 Q. Okay. And this was an e-mail sent by
 21 you to that group on October 25th, 2013; is that
 22 correct?

23 A. That's correct.

24 Q. Okay. Can you briefly describe the
 25 contents of this e-mail that you sent, as

1 driver's license and it would not scan, so they
 2 used other voter registration card. And my
 3 response was, I had a similar incident. My
 4 driver's license still does not match exactly the
 5 voter registration card because my driver's
 6 license did not match my name on the voter roll.
 7 I showed my voter registration certificate, okay,
 8 which also did not match. And that they did
 9 allow me to vote, a regular ballot.

10 Q. So that describes something that
 11 happened to you?

12 A. Yes. That happened to me, but let me
 13 just make a disclosure. I'm a precinct chair
 14 too. They know who I am at the voting location.

15 Q. So let me ask you a little bit about
 16 that. You are a voting -- you're a voting
 17 precinct chair?

18 A. I'm a precinct chair, yes --

19 Q. What does the --

20 A. -- and I'm allowed to vote.

21 Q. Sorry, say that again.

22 A. I'm a precinct chair and I am allowed
 23 to vote.

24 Q. I'm not questioning that.

25 A. Okay.

<p>1 Q. Describe what a precinct chair is. 2 A. A precinct chair, you have a 3 geographical area where you try to provide 4 information to your community about voting. 5 Obviously the most important piece is mobilizing 6 people to go out and vote, and I do registration 7 as well.</p> <p>8 Q. So are you a precinct chair for the 9 Texas NAACP?</p> <p>10 A. No. For the county.</p> <p>11 Q. For the county? Is that Dallas County?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. How long have you been a 14 precinct chair for Dallas County?</p> <p>15 A. Probably about ten years.</p> <p>16 Q. Are there any other duties that you 17 didn't describe for a precinct chair?</p> <p>18 A. I no long- -- I used to conduct 19 elections, but I don't do that anymore.</p> <p>20 Q. Okay. So a precinct chair -- and I'm 21 trying to read what's on the live feed again. 22 It -- you get information out about getting 23 people to vote and you do -- you said you do 24 registration as well. What does that mean?</p> <p>25 A. I do voter registration.</p>	<p>102</p> <p>1 A. Yes. 2 Q. And he is the president of the Texas 3 NAACP; is that correct? 4 A. That's correct. 5 Q. Okay. In the paragraph that appears 6 below the name Yannis, there's a sentence in the 7 middle of that paragraph that says, "Also, 8 remember we wanted to take Bob's idea and have 9 some folks go without an ID and vote with a 10 provisional ballot and show their driver's 11 license later and then see if they were counted." 12 Is that correct? Is that an accurate reading of 13 that statement? 14 A. Um-huh. That is. 15 Q. Who is Bob? 16 A. Bob Lydia. He's our first vice 17 president. 18 Q. Are you related to Bob Lydia? 19 A. I'm his wife. 20 Q. And he is the first vice president of 21 the Texas NAACP? 22 A. That's correct. 23 Q. So does that mean he's on the executive 24 committee? 25 A. Yes, he is.</p>
<p>1 Q. You help people get registered?</p> <p>2 A. Um-hum.</p> <p>3 Q. Is that -- you actually process the --</p> <p>4 A. I will hand out cards to people to fill</p> <p>5 out and I also can -- I'm deputized where I can</p> <p>6 fill out voter registration cards.</p> <p>7 Q. People dictate to you their information</p> <p>8 and you fill out their registration cards for</p> <p>9 them?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And you do that for Dallas County?</p> <p>12 A. And again, it's volunteer.</p> <p>13 Q. Okay.</p> <p>14 A. I want to make sure you understand.</p> <p>15 Dallas County is not paying me to do that.</p> <p>16 Q. That was going to be my next question.</p> <p>17 A. No.</p> <p>18 Q. Okay. And you've been volunteering in</p> <p>19 that capacity for about ten years you said?</p> <p>20 A. Yes. Thereabouts.</p> <p>21 Q. Further down on this document that I</p> <p>22 handed you --</p> <p>23 A. Um-hum.</p> <p>24 Q. -- it appears to be an e-mail from Gary</p> <p>25 Bledsoe; is that correct?</p>	<p>103</p> <p>1 Q. Okay. Was Bob's idea, that is 2 summarized here in this sentence, was that idea 3 put into practice?</p> <p>4 A. To my knowledge, it was not.</p> <p>5 Q. On the last page there, just one quick 6 sentence at the top, it says, "Adding Robert to 7 this e-mail." Is that Robert Knatsen (phonetic), 8 to your knowledge?</p> <p>9 A. You know, that's highly possible, but 10 I'm not certain.</p> <p>11 Q. Okay. You don't know who Robert is 12 there for certain?</p> <p>13 A. I'm not sure who that Robert is --</p> <p>14 Q. Okay.</p> <p>15 A. -- for certain. I think Yannis wrote 16 that.</p> <p>17 Q. It appears he did.</p> <p>18 A. Yeah.</p> <p>19 (Deposition Exhibit Number 5 was 20 marked for identification.)</p> <p>21 Q. (BY MR. TATUM) Ms. Lydia, I'm handing 22 you what's been marked as Exhibit 5. And again, 23 I represent to you that this document has been 24 produced to the defendants in this litigation.</p> <p>25 Do you recognize this document?</p>

<p>1 A. Yes, sir.</p> <p>2 Q. Okay. Is this an e-mail that you wrote 3 to the group of e-mail addresses listed there?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And it was written on January 25th, 6 2014; is that correct?</p> <p>7 A. That's correct.</p> <p>8 Q. Okay. And does this e-mail accurately 9 depict you wrote that day, to the best of your 10 memory?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Okay. And does that e-mail group, 13 similar to the last document I gave you, contain 14 the names and e-mail addresses of branch --</p> <p>15 A. Presidents.</p> <p>16 Q. -- presidents? Does it include 17 political action chairs as well?</p> <p>18 A. Yes, it does.</p> <p>19 Q. If you could for me turn to the next 20 page.</p> <p>21 A. Um-hum.</p> <p>22 Q. Looking at the top of the page at the 23paragraph beginning with "During our October 24 convention."</p> <p>25 A. Um-hum.</p>	<p>106</p> <p>1 Q. And do you recall the results of that 2 test?</p> <p>3 A. No, I really don't. And I was just 4 trying to remember even which cities where I know 5 it was enacted and it was done, and I don't 6 recall them.</p> <p>7 Q. Do you know if as a result of those 8 tests anyone was unable to obtain an EIC?</p> <p>9 A. Not for sure.</p> <p>10 Q. Do you know -- sorry.</p> <p>11 A. I'm really not for sure.</p> <p>12 Q. Do you know what kind of resources were 13 expended to conduct those tests?</p> <p>14 A. Obviously man-hours. People who had to 15 disengage from whatever they were doing to go to 16 the DPS office, and considering the hours they're 17 operating, they had to take off from work to go 18 do this, and obviously the resources of driving 19 there and making certain that they had the proper 20 documentation to acquire the EIC.</p> <p>21 Q. Do you know who conducted these tests?</p> <p>22 A. I'm not for sure. I told you, I know 23 that only a couple of cities actually did it. I 24 remember there was one particular city who said 25 they didn't have a DPS office, and, again, I --</p>
<p>1 Q. Okay. It says there, "During our 2 October convention, it was decided that our units 3 would test the process of acquiring election 4 identification certificates from DPS offices 5 across the state."</p> <p>6 Is that an accurate reading of that 7 statement?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And did you write that statement?</p> <p>10 A. Yes, I did.</p> <p>11 Q. Okay. Were those tests described in 12 that sentence conducted?</p> <p>13 A. To some level they were.</p> <p>14 Q. And can you describe the results of 15 that test?</p> <p>16 A. Whoa. I'm not really certain of the 17 exact, because it was only done maybe in a couple 18 of the cities, and I don't remember or recall the 19 exact outcome as to acquiring the EIC.</p> <p>20 Q. Did that test involve -- I'm sorry. 21 I'll retract that question.</p> <p>22 So you said this test was conducted 23 in a couple of cities; is that correct?</p> <p>24 A. Yeah, I think it was in a couple of 25 cities.</p>	<p>107</p> <p>1 and they -- and we didn't want them to have to 2 expand the funds going into another county that 3 was really quite distanced from them.</p> <p>4 This has been part of our 5 contention is that these offices are just not 6 located close to where we live or work and so 7 it's created a financial hardship.</p> <p>8 Q. Do you know who would know the results 9 of these tests?</p> <p>10 A. The individuals who did them --</p> <p>11 Q. Do you know --</p> <p>12 A. -- obviously.</p> <p>13 Q. Do you know who would know who the 14 individuals that conducted these tests were?</p> <p>15 A. I should know, but I can't remember 16 them. I want to think something -- I want to 17 think maybe --</p> <p>18 Q. Does someone know who these people are 19 that conducted these tests?</p> <p>20 A. I'm sure that someone who were a part 21 of this committee would know.</p> <p>22 Q. But you don't know who that is?</p> <p>23 A. No. I'm not sure specifically who on 24 that committee would know.</p> <p>25 Q. Okay. And again just to confirm, these</p>

<p>1 tests in some -- to some extent have been 2 conducted to date?</p> <p>3 A. Yes, they have. Um-hum.</p> <p>4 Q. But you don't know the result of it?</p> <p>5 A. I don't know the outcome of them.</p> <p>6 Q. And you don't know who would know the 7 outcome of them?</p> <p>8 A. Not at this time. I could probably 9 research it for you, but I don't know at this 10 time.</p> <p>11 Q. Think about it.</p> <p>12 A. Okay. Let me think about it, and if I 13 come up with the names of the cities -- if I can 14 come up with the names of the cities, I can 15 perhaps come up with the name of the person.</p> <p>16 Q. You mentioned a conference call -- 17 sorry, back to the document.</p> <p>18 A. Um-hum.</p> <p>19 Q. You mentioned a conference call to plan 20 the carrying out of this effort on Monday night 21 at 9:00 p.m.?</p> <p>22 A. Um-hum.</p> <p>23 Q. Do you recall if that conference call 24 took place?</p> <p>25 A. Yes, it did.</p>	<p>110</p> <p>1 on the process involved with getting an EIC from 2 the Secretary of State's website?</p> <p>3 A. Um-hum. Um-hum. Yes.</p> <p>4 Q. Did you send any other information 5 that's not included in this e-mail?</p> <p>6 A. I'm trying to think about that for a 7 second. Is there anything I sent out with them.</p> <p>8 There is a possibility that's lingering in the 9 back of my mind that may be locations of DPS 10 offices, at some point, may have been provided.</p> <p>11 I'm not sure if it was with this or with 12 something at the state convention.</p> <p>13 This was -- this was pursuant to 14 the state convention. This came about in 15 January. Our convention was in October, where 16 this committee, people had agreed to be a part of 17 this process. So I'm not sure if we gave them 18 the DPS office locations, printed information, 19 because not everybody in our association have 20 access to internet and computers, and, yadda, 21 yadda, yadda, to get all this information. So we 22 have to provide a certain amount of printed 23 material to ensure execution of some of our 24 efforts.</p> <p>25 Q. On the last page of that document --</p>
<p>1 Q. Who was on the conference call?</p> <p>2 A. I was definitely on the conference 3 call. Our political action chair would have been 4 on the call. And our co-chair, I'm sure she was 5 on it. And various branch presidents. All of 6 those names above the cc --</p> <p>7 Q. Um-hum.</p> <p>8 A. -- those are branch presidents, and 9 then as far as which ones were on it, I really, 10 really, really can't tell you.</p> <p>11 Q. The information that follows your 12 written paragraph there, titled "How to apply."</p> <p>13 A. Um-hum.</p> <p>14 Q. There's various information after that. 15 Some of it's stating, "To qualify for an EIC you 16 must bring documentation," and kind of describing 17 that documentation; is that correct?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Who compiled that information?</p> <p>20 A. I copied and pasted it from the 21 Secretary of State website. It's a copy and 22 paste straight from them.</p> <p>23 Q. So in order to -- again, in relation to 24 these tests, in order to educate those who would 25 be carrying out these tests, you sent information</p>	<p>111</p> <p>1 A. Um-hum.</p> <p>2 Q. -- there's an e-mail from Yannis Banks, 3 it appears; is that correct?</p> <p>4 A. Um-hum.</p> <p>5 Q. Sent on December 23rd, 2013; is that 6 correct?</p> <p>7 A. Um-hum.</p> <p>8 Q. Do you know who he was sending that 9 e-mail to?</p> <p>10 A. I have no idea.</p> <p>11 Q. Do you know if he obtained -- from 12 whoever he was sending this e-mail to, do you 13 know if he obtained a list of names of people who 14 had to cast a provisional ballot in the state of 15 Texas?</p> <p>16 A. I have no idea.</p> <p>17 (Deposition Exhibit Number 6 was 18 marked for identification.)</p> <p>19 Q. (BY MR. TATUM) I'm handing you what's 20 been marked as Exhibit 6.</p> <p>21 A. Um-hum.</p> <p>22 Q. I represent to you that this document 23 has been presented or produced to the defendants 24 in this litigation.</p> <p>25 Ms. Lydia, do you recognize this</p>

<p>1 document?</p> <p>2 A. Yes.</p> <p>3 Q. What is this document?</p> <p>4 A. This is an action alert.</p> <p>5 Q. And what is an action alert?</p> <p>6 A. These are sent out by our national</p> <p>7 office.</p> <p>8 Q. So this was compiled and sent out by</p> <p>9 the National NAACP office?</p> <p>10 A. It probably was sent to either Yannis</p> <p>11 or myself, and we, in turn, probably dispersed it</p> <p>12 to the units to let them know about it.</p> <p>13 Q. Did you disperse it by e-mail or snail</p> <p>14 mail?</p> <p>15 A. E-mail, faxes, for the most part.</p> <p>16 Q. Down in the middle of this page under</p> <p>17 the heading, "Now is your time to get involved,"</p> <p>18 it states there, "We are calling on local</p> <p>19 branches to help our efforts by taking the</p> <p>20 following three steps."</p> <p>21 Do you see that section?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. Reading from that, the first</p> <p>24 step says, "Visit free or low income health</p> <p>25 clinics to see if coordinators are willing to</p>	<p>114</p> <p>1 Do you know if any VFW hall</p> <p>2 referred any persons who had an unexpired photo</p> <p>3 ID required to vote?</p> <p>4 A. No, sir.</p> <p>5 Q. Okay.</p> <p>6 A. I do not know that.</p> <p>7 (Deposition Exhibit Number 7 was</p> <p>8 marked for identification.)</p> <p>9 Q. (BY MR. TATUM) I'm handing you what's</p> <p>10 been marked as Exhibit 7. This document has been</p> <p>11 produced to the defendants in this litigation.</p> <p>12 A. (Witness examined exhibit.)</p> <p>13 Q. Ms. Lydia, do you recognize this</p> <p>14 document?</p> <p>15 A. Yes, sir, I do.</p> <p>16 Q. And what is this document?</p> <p>17 A. These are minutes of the meeting of our</p> <p>18 last executive committee meeting, the first</p> <p>19 quarter 2014 in Lufkin.</p> <p>20 Q. So that was the last quarterly</p> <p>21 executive committee meeting held?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. You mentioned as secretary you</p> <p>24 keep minutes of such meetings, correct?</p> <p>25 A. Um-hum, um-hum.</p>
<p>1 help us with referrals for citizens without IDs."</p> <p>2 Is that a correct reading of that</p> <p>3 statement?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you know what kind of health clinics</p> <p>6 were reached out to?</p> <p>7 A. I have no idea.</p> <p>8 Q. Do you know if they were reached out</p> <p>9 to?</p> <p>10 A. No idea, sir.</p> <p>11 Q. Okay. Do you know if any referrals</p> <p>12 were obtained for citizens without IDs?</p> <p>13 A. No, I have no idea either.</p> <p>14 Q. Do you know, looking at Point 2, do you</p> <p>15 know if any local church services with large</p> <p>16 minority congregations were able to provide the</p> <p>17 identity of persons without ID?</p> <p>18 A. No idea.</p> <p>19 Q. Looking at Point 3, what is a VFW hall,</p> <p>20 do you know what that is?</p> <p>21 A. Veterans of Foreign War.</p> <p>22 Q. That statement says, "Go to the VFW</p> <p>23 halls in your area and request assistance in</p> <p>24 locating people who do not have the unexpired</p> <p>25 photo ID required to vote."</p>	<p>115</p> <p>1 Q. Do these minutes represent what you</p> <p>2 took down yourself?</p> <p>3 A. Yes, sir.</p> <p>4 Q. So you compiled this document?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. If you would, turn to -- it's</p> <p>7 not marked with individual page numbers, but it's</p> <p>8 basically the third page of this document.</p> <p>9 A. Um-hum.</p> <p>10 Q. The bottom quarter of that document</p> <p>11 says 6043.</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Are you on that page?</p> <p>14 A. Yes, I am.</p> <p>15 Q. Okay. The top of that page, it says,</p> <p>16 "Voter ID is the other case scheduled for 9-17 in</p> <p>17 Corpus Christi and it will also go to the Fifth</p> <p>18 Circuit."</p> <p>19 Is that an accurate reading of that</p> <p>20 statement?</p> <p>21 A. Yes.</p> <p>22 Q. Could you read the first bullet point</p> <p>23 under that statement, please.</p> <p>24 A. "I want to do a sting to see the ease</p> <p>25 of getting the free voter ID with our branches."</p>

<p>1 Q. What did you mean when you wrote "a 2 sting"?</p> <p>3 A. Well, a test. The same thing that we 4 had talked about for the conference call.</p> <p>5 Q. And do you know if a sting to see the 6 ease of getting a free voter ID was conducted?</p> <p>7 A. I have not received any information 8 that anyone has done that.</p> <p>9 Q. Okay. When you're referring to a sting 10 in this sentence, is that the same test that was 11 referred to in a previous document I showed to 12 you?</p> <p>13 A. Exactly. It's a test.</p> <p>14 Q. Okay. So you're referring to -- here 15 you're referring to getting an EIC?</p> <p>16 A. EIC, yes.</p> <p>17 Q. Okay. Could you read the third bullet 18 point there, please.</p> <p>19 A. "Need examples of folks who were 20 denied."</p> <p>21 Q. Do you know if any of such examples 22 were found or provided?</p> <p>23 A. I have no idea.</p> <p>24 Q. Okay. Is that also in reference to the 25 EIC test?</p>	118	<p>1 Protection. I'm familiar with it. I really do 2 see a lot of documents. I don't have any direct 3 recall of it, but it looks like something I 4 probably would have seen.</p> <p>5 Q. Okay. Was this document, to your 6 knowledge, compiled by the NAACP, the Texas 7 NAACP?</p> <p>8 A. No, I don't think so.</p> <p>9 Q. Is this the kind of document that the 10 Texas NAACP would distribute to its members?</p> <p>11 A. It's informational. I mean, obviously 12 this sort of clarifies to individuals what would 13 be needed to vote. I mean, I wouldn't see 14 anything objectionable as long as it's 15 nonpartisan and it's not advocating for one party 16 over another, yeah, I would say we would do that.</p> <p>17 We would hand out something like 18 this. It would not be -- it would not be 19 something that would be opposed to our 20 constitution and bylaws.</p> <p>21 Q. So you mentioned it would be handed 22 out. Is that the only way that something like 23 this would be distributed?</p> <p>24 A. Handed out, e-mailed, I would think.</p> <p>25 Q. Okay.</p>	120
<p>1 A. Yes, sir.</p> <p>2 Q. Okay. The very next line down mentions 3 a name TaNeika; is that correct?</p> <p>4 A. That's correct.</p> <p>5 Q. Who is that?</p> <p>6 A. She's the president of one of our 7 units.</p> <p>8 Q. One of the local branches?</p> <p>9 A. One of our branches of the state.</p> <p>10 Q. Right. She's the president of one of 11 the local NAACP branches in Texas?</p> <p>12 A. Yes, uh-huh.</p> <p>13 Q. Do you know which branch?</p> <p>14 A. Killeen, Texas, I'm pretty certain. (Deposition Exhibit Number 8 was marked for identification.)</p> <p>15 Q. (BY MR. TATUM) Handing you a copy of 16 what's been marked as Exhibit 8. This has also 17 been produced to the defendants in this 18 litigation.</p> <p>19 Ms. Lydia, do you recognize this 20 document?</p> <p>21 A. (Witness examined exhibit.)</p> <p>22 Hmmm. I'm going to have to say I 23 don't recognize it, but I know Election</p>	119	<p>1 A. And, yes, I think I have seen this 2 document before, and actually I think I saw it at 3 somebody else's event at a church, I think is 4 where I saw it.</p> <p>5 Q. That document was not created by the 6 Texas NAACP?</p> <p>7 A. Oh, no. We did not create that.</p> <p>8 Q. Okay. Does the Texas NAACP regularly 9 distribute materials that it did not itself 10 create?</p> <p>11 A. On occasion, and occasionally we will 12 coalesce. Like the Texas Criminal Justice 13 coalition where we had the re-enfranchisement 14 effort, we coalesced with them to create a 15 document, that way we can -- our resources can go 16 further.</p> <p>17 Q. So do you often seek assistance from 18 other organizations to accomplish tasks such as 19 print-outs, fliers, handouts, that kind of thing?</p> <p>20 A. On occasions.</p> <p>21 Q. Okay. And in return, do you provide 22 similar services to other organizations if they 23 ask for it?</p> <p>24 A. Again, they have to fall within the 25 purview of our national guidelines --</p>	121

	122		124
<p>1 Q. Of course.</p> <p>2 A. -- of coalescing, because we have to</p> <p>3 have approval to coalesce in groups.</p> <p>4 (Deposition Exhibit Number 9 was</p> <p>5 marked for identification.)</p> <p>6 Q. (BY MR. TATUM) I'm handing you what's</p> <p>7 been identified as Exhibit 9.</p> <p>8 MR. TATUM: And I only brought one</p> <p>9 copy of that.</p> <p>10 MS. RUDD: That's fine. I'll just</p> <p>11 share.</p> <p>12 THE WITNESS: Oh, okay.</p> <p>13 MR. TATUM: I didn't even bring one</p> <p>14 for myself.</p> <p>15 Q. (BY MR. TATUM) Ms. Lydia, that</p> <p>16 document has been produced to defendants in this</p> <p>17 litigation. Do you recognize that document?</p> <p>18 A. Yes.</p> <p>19 Q. What is it?</p> <p>20 A. It's basically part of the study for</p> <p>21 the EIC.</p> <p>22 Q. Okay. So the study -- the test that</p> <p>23 you referred to previously --</p> <p>24 A. Um-hum.</p> <p>25 Q. -- that is a -- how does that relate to</p>		<p>1 break or are we continuing on?</p> <p>2 MR. TATUM: Oh. No, sorry, Angela,</p> <p>3 we're continuing on.</p> <p>4 MS. MILLER: Okay. Sounds good.</p> <p>5 MR. TATUM: Okay.</p> <p>6 Q. (BY MR. TATUM) Ms. Lydia, to the best</p> <p>7 of your knowledge, have any Texas NAACP ever</p> <p>8 expressed concerns to you or to the executive</p> <p>9 committee regarding election crimes, voter fraud</p> <p>10 or voter impersonation?</p> <p>11 A. No.</p> <p>12 Q. Has the Texas NAACP ever conducted any</p> <p>13 studies or collected data from its members or</p> <p>14 from any other sources relating to election</p> <p>15 crimes, voter fraud or voter impersonation?</p> <p>16 A. No, not to my knowledge.</p> <p>17 Q. Are there plans to conduct any such</p> <p>18 studies?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Okay. If there were plans to conduct</p> <p>21 such studies, would you know about it?</p> <p>22 A. It would have to be voted on upon by</p> <p>23 the executive committee.</p> <p>24 Q. On that note, do actions of the Texas</p> <p>25 NAACP that must be voted on by the executive</p>	
<p>1 the test?</p> <p>2 A. Well, it basically is used to collect</p> <p>3 the data that they would have obtained as a</p> <p>4 result of going to a DPS office to try to obtain</p> <p>5 an EIC.</p> <p>6 Q. And once filled out, who would those</p> <p>7 forms have been submitted to?</p> <p>8 A. Once filled out, they should have been</p> <p>9 submitted either to Yannis or myself.</p> <p>10 Q. Do you recall ever seeing a filled-out</p> <p>11 version of that?</p> <p>12 A. No, I've never gotten one.</p> <p>13 Q. Okay. I have no more documents to give</p> <p>14 you right now.</p> <p>15 A. Okay.</p> <p>16 Q. That's the last of that string.</p> <p>17 MR. TATUM: Is everyone doing all</p> <p>18 right? Do we need to take a break for any</p> <p>19 reason?</p> <p>20 MS. MILLER: Whenever you guys</p> <p>21 want.</p> <p>22 MS. RUDD: I'm fine. Are you okay?</p> <p>23 THE WITNESS: Yeah.</p> <p>24 MR. TATUM: Okay.</p> <p>25 MS. MILLER: Are we going to take a</p>	123		125
		<p>1 committee, do those votes only occur at the</p> <p>2 quarterly meetings?</p> <p>3 A. No.</p> <p>4 Q. Can they occur on a moment's notice or</p> <p>5 outside of those quarterly meetings?</p> <p>6 A. Yes, they can.</p> <p>7 Q. Okay.</p> <p>8 A. Definitely.</p> <p>9 MR. TATUM: Actually, I think this</p> <p>10 is a pretty good place to take a break, if that's</p> <p>11 all right. It's 11:40. We're kind of</p> <p>12 approaching the lunch hour.</p> <p>13 Can we go off record to discuss</p> <p>14 real quick.</p> <p>15 MS. RUDD: Sure.</p> <p>16</p> <p>17 (Discussion off the record.)</p> <p>18 (Lunch recess.)</p> <p>19</p> <p>20 REPORTER'S NOTE: Please be advised</p> <p>21 that an UNCERTIFIED ROUGH DRAFT version of this</p> <p>22 transcript exists. If you are in possession of</p> <p>23 said rough draft, please replace it immediately</p> <p>24 with this CERTIFIED FINAL TRANSCRIPT.</p> <p>25</p>	

<p>1 AFTERNOON SESSION 2 MR. TATUM: We're back on the 3 record. 4 EXAMINATION (CONTINUED) 5 BY MR. TATUM: 6 Q. Ms. Lydia, before we took a break, we 7 were talking about activities of the Texas NAACP 8 related to SB 14. You had previously talked 9 about -- we covered education. We covered 10 registration. We covered legislation, and then 11 right before the break, you were talking about 12 testing the process by which an EIC is obtained, 13 correct? 14 A. Yes. 15 Q. Are there any other activities related 16 to SB 14 that the Texas NAACP has committed 17 resources to that you did not already mention? 18 A. I think I have mentioned a few 19 occasions the reallocations of staff to the 20 efforts related to the litigation itself -- 21 excuse me -- as well as the focus, the main focus 22 of the activities that are being conducted by our 23 state conference. 24 Q. So would you call -- 25 A. Excuse me.</p>	<p>126</p> <p>1 A. I think that some of our units 2 definitely would have done that and would have 3 assisted them the best they could. If it was 4 something that could be -- if there was -- if it 5 was a process that was -- or a procedure that was 6 needed, I know that some of our units would have 7 probably assisted them in getting that worked 8 out, whether it was telling them how to go about 9 getting -- and now some of them are 10 insurmountable, you know, where people who were 11 delivered by midwives and perhaps do not have a 12 birth certificate. 13 And then others, obviously you can 14 assist them by telling them where they need to go 15 to get a birth certificate in order to complete 16 the process of getting identification. 17 Q. Does the Texas NAACP claim that it has 18 members or constituents who are registered to 19 vote but do not possess any of the acceptable 20 forms of ID under SB 14? 21 A. I'm not really sure of that. Let me 22 just say I don't have personal knowledge of that. 23 Q. You don't have personal knowledge of 24 whether there are any members of the Texas NAACP 25 who do not have an acceptable form of ID under</p>
<p>1 Q. Sorry. When you say "the main focus of 2 the activities," what is the -- what is the main 3 focus of the activities, if you haven't already 4 described it? 5 A. The litigation and preparing for this 6 litigation to try to reverse what has happened 7 because of the perceived impact on the voting 8 process within our state. 9 Q. Are there any other kind of field tests 10 or stings that the Texas NAACP has conducted 11 related to SB 14? 12 A. I think most of the other activities 13 would have been -- would be surrounding educating 14 our communities and that's an ongoing process. 15 As I said earlier, I don't think we 16 have been successful in getting this message to 17 as many people as we need to, but we have started 18 making inroads through our units to our distant 19 communities regarding the necessities that are 20 being required for people to vote. 21 Q. Has the Texas NAACP itself been 22 actively seeking to identify either its own 23 members or registered voters in Texas that do not 24 have an acceptable form of ID to vote under 25 SB 14?</p>	<p>127</p> <p>1 SB 14? 2 A. When you consider the size of our 3 organization and the number of people we have, I 4 would be -- I think I would be really careless to 5 say that nobody has been impacted by the need for 6 this ID. I think the odds are just absolutely in 7 favor of perhaps that having been the case, that 8 they have been negatively impacted. 9 MS. RUDD: And maybe this is a good 10 place, Stephen, for me to interject that we're 11 not presently aware of any particular -- the 12 identity of any particular member who has been or 13 will be injured by Senate Bill 14 for the 14 purposes of proving standing in this case. But 15 we will supplement that response if and when we 16 identify such a member. 17 So I think that's consistent with 18 what we agreed to, and it's consistent with what 19 Mr. Banks testified to in terms of not having yet 20 identified any particular member who suffered 21 injury as a result of Senate Bill 14. 22 MR. TATUM: Okay. So just to 23 confirm . . . 24 MS. RUDD: So I think when we're 25 talking about that agreement --</p>

<p>1 MR. TATUM: Yes.</p> <p>2 MS. RUDD: -- we're falling under</p> <p>3 Number 2, Stephen.</p> <p>4 MR. TATUM: Okay. And, Angela,</p> <p>5 we're talking about the e-mail chain between Ezra</p> <p>6 and Lindsey Wolf.</p> <p>7 MS. MILLER: Okay.</p> <p>8 MR. TATUM: The agreement that's</p> <p>9 encompassed in that e-mail chain.</p> <p>10 MS. MILLER: Okay.</p> <p>11 MR. TATUM: Right now we're under</p> <p>12 Number 2; that Texas NAACP is either unaware of</p> <p>13 the identity of any particular member who has</p> <p>14 been or may be injured by the implementation of</p> <p>15 SB 14 or that it does not maintain sufficient</p> <p>16 information to identify a particular member who</p> <p>17 has been or may be injured by implementation of</p> <p>18 SB 14.</p> <p>19 MS. RUDD: Correct. And the only</p> <p>20 caveat to that, I will add, is that it's a</p> <p>21 present awareness. So there may be a time where</p> <p>22 we do become aware of a particular member's</p> <p>23 identity, at which point we will give you that</p> <p>24 information, as well, subject to the highly</p> <p>25 confidential designation.</p>	<p>130</p> <p>1 A. Not really, no. There's no cost. It's</p> <p>2 free.</p> <p>3 Q. Are there any nonmonetary costs to</p> <p>4 getting an EIC -- sorry. Are there any</p> <p>5 nonmonetary costs to getting a voter registration</p> <p>6 card?</p> <p>7 A. The accessibility of voter registration</p> <p>8 cards at every post office, library, church in</p> <p>9 our community, makes it, as far as I am</p> <p>10 concerned, a nonmonetary event.</p> <p>11 Q. So do you believe that there is no</p> <p>12 associated costs, monetary or otherwise, with</p> <p>13 getting a voter registration card?</p> <p>14 A. No. There's not even postage required</p> <p>15 to send the card in. There's -- there's no cost.</p> <p>16 You fill it out and send it.</p> <p>17 Q. Does that require time to fill out a</p> <p>18 voter registration card?</p> <p>19 A. Well, yes, of course.</p> <p>20 Q. Do you consider the expense of time as</p> <p>21 a cost with getting a voter registration card or</p> <p>22 an EIC?</p> <p>23 A. Yeah, there is an expense of time. If</p> <p>24 that's what you want me to say. Yes, there is.</p> <p>25 Q. I don't want you to say anything. I</p>
<p>1 MR. TATUM: Okay. Thank you for</p> <p>2 interjecting that.</p> <p>3 If you would, give me a moment</p> <p>4 to --</p> <p>5 THE WITNESS: No problem.</p> <p>6 Q. (BY MR. TATUM) Ms. Lydia, does the</p> <p>7 Texas NAACP -- are you ready?</p> <p>8 A. Yes.</p> <p>9 Q. Does the Texas NAACP contend that there</p> <p>10 are associated costs with getting an EIC?</p> <p>11 A. Yes.</p> <p>12 Q. And what are those associated costs?</p> <p>13 A. Getting to a DPS office. That would be</p> <p>14 the first. The hours of operation of the DPS</p> <p>15 office would necessitate someone having to take</p> <p>16 off of work in order to get there.</p> <p>17 Birth certificates, if you do not</p> <p>18 have a copy of one, you have to order those</p> <p>19 through the Bureau of Vital Statistics. There's</p> <p>20 a cost associated with that. Those are all, I</p> <p>21 think, real causes -- costs, rather, associated</p> <p>22 with getting an EIC.</p> <p>23 Q. Does the Texas NAACP believe that there</p> <p>24 are associated costs with getting a voter</p> <p>25 registration card?</p>	<p>131</p> <p>133</p> <p>1 want you to give an honest answer.</p> <p>2 A. Well, obviously the card has to be</p> <p>3 filled out by someone in order for it to be</p> <p>4 processed by the election department within the</p> <p>5 respective county.</p> <p>6 So there is some time, but the time</p> <p>7 involved in that is so minimal. We're talking</p> <p>8 name, address, date of birth, the last four of a</p> <p>9 social or a driver's license, and you sign it.</p> <p>10 It does not require production of a -- any type</p> <p>11 of documentation to prove who you are.</p> <p>12 Q. Ms. Lydia, why does the Texas NAACP</p> <p>13 feel it necessary to devote time and resources</p> <p>14 towards voter registration activities?</p> <p>15 A. Because it -- because this is a right</p> <p>16 of citizenship in this country, the right to</p> <p>17 vote. And especially it has been hard fought by</p> <p>18 African-Americans. The time was we had poll</p> <p>19 taxes as a form of disenfranchising. "How many</p> <p>20 bubbles in a bar of soap" kind of lunacy testing.</p> <p>21 So, yeah, there is a long and</p> <p>22 egregious history of African-Americans and other</p> <p>23 minorities being disenfranchised in this country.</p> <p>24 And maybe I'm a little bit outraged</p> <p>25 that I even have to answer that question because</p>

<p>1 it's so blatantly obviously.</p> <p>2 Q. Ms. Lydia, to be clear, I am not</p> <p>3 questioning whether someone should have the right</p> <p>4 to register to vote.</p> <p>5 A. Okay. Understood.</p> <p>6 Q. Okay. I don't want to come across</p> <p>7 as --</p> <p>8 A. I gotcha.</p> <p>9 Q. -- as questioning that right.</p> <p>10 A. Okay. Thank you.</p> <p>11 Q. What I'm wondering is if there are so</p> <p>12 minimal costs to getting a voter registration</p> <p>13 card --</p> <p>14 A. Um-hum.</p> <p>15 Q. -- why does the Texas NAACP devote so</p> <p>16 many resources towards helping people get</p> <p>17 registered?</p> <p>18 A. Because it's part of our mission.</p> <p>19 Q. And is it still able to fulfill that</p> <p>20 part of its mission since the enactment of SB 14?</p> <p>21 A. Yes, with added -- with an added</p> <p>22 burden.</p> <p>23 Q. And with regard to getting a voter</p> <p>24 registration card, what is that added burden?</p> <p>25 A. We have to educate them about what they</p>	<p>134</p> <p>1 SB 14?</p> <p>2 A. Yes.</p> <p>3 Q. And what is the basis for that claim?</p> <p>4 A. I think the socioeconomic factors that</p> <p>5 are present in our community would lend to that.</p> <p>6 Q. Could you describe some of those</p> <p>7 socioeconomic factors.</p> <p>8 A. Not everybody in our community. I</p> <p>9 think we have a disproportionately lower number</p> <p>10 of individuals with automobiles, which in Texas</p> <p>11 is a necessity. If you lived in, say,</p> <p>12 San Francisco where the BART can take you</p> <p>13 anywhere and everywhere you want to go with ease</p> <p>14 and affordability, I would say maybe not as much.</p> <p>15 But in Texas, a car is essential because our mass</p> <p>16 transportation system is not adequate.</p> <p>17 And so as a result, if you don't</p> <p>18 have a car, there's no way you could really get</p> <p>19 to a DPS office unless you catch the bus, and</p> <p>20 then you're talking about two or three buses to</p> <p>21 get there because, again, the DPS offices are not</p> <p>22 located in our neighborhoods. The hours of</p> <p>23 operation would require us to take off work in</p> <p>24 order to go and apply for an EIC or any form of</p> <p>25 identification that you would acquire through</p>
<p>1 have to do in order to utilize that voter</p> <p>2 registration card.</p> <p>3 Q. Okay.</p> <p>4 A. If you don't have the documentation or</p> <p>5 the ID to go with that voter registration card,</p> <p>6 it's a worthless piece of paper.</p> <p>7 Q. Does the Texas NAACP contend that SB 14</p> <p>8 amounts to a poll tax?</p> <p>9 A. I don't know if the Texas State NAACP</p> <p>10 does, but I do.</p> <p>11 Q. And why do you believe that?</p> <p>12 A. Because it's another obstacle to</p> <p>13 someone going to vote. Anything that presents an</p> <p>14 obstacle or an encumbrance to people exercising</p> <p>15 their rights, you know, that was guaranteed under</p> <p>16 the 14th, I think it -- I see it as being a</p> <p>17 burden.</p> <p>18 Q. Ms. Lydia, to the best of your</p> <p>19 knowledge, is SB 14 the first law that has -- or</p> <p>20 the first bill that has changed the law with</p> <p>21 regard to voting requirements in Texas?</p> <p>22 A. To my knowledge, it is.</p> <p>23 Q. Does the Texas NAACP contend that</p> <p>24 minority citizens are less likely than white</p> <p>25 citizens to have an acceptable form of ID under</p>	<p>135</p> <p>1 DPS. It's a burden and it's impacting us because</p> <p>2 we don't have transportation, one.</p> <p>3 We don't have the financial</p> <p>4 resources. Our unemployment is in double digits</p> <p>5 whereas the rest of the country is in single</p> <p>6 digits. It's gone down some, yes. But there</p> <p>7 still is, you know, a disparity there, and so we</p> <p>8 don't have the financial resources to catch the</p> <p>9 bus as often or acquire other forms of</p> <p>10 transportation to get to these places to acquire</p> <p>11 identification.</p> <p>12 Those, I think, are probably the</p> <p>13 most compelling reasons.</p> <p>14 Q. And are those reasons that you just</p> <p>15 summarized, are those based on any specific data</p> <p>16 or studies or anything like that?</p> <p>17 A. I think the statistics are stated in</p> <p>18 the complaint.</p> <p>19 Q. You'd defer to the statistics in the</p> <p>20 complaint?</p> <p>21 A. Um-hum.</p> <p>22 Q. Okay. Does the Texas NAACP contend</p> <p>23 that minority citizens are less likely to be able</p> <p>24 to obtain an acceptable form of ID than white</p> <p>25 citizens?</p>

<p>1 A. Yes.</p> <p>2 Q. And what is the basis for that claim?</p> <p>3 A. The socioeconomic reasons that I just</p> <p>4 stated to you.</p> <p>5 Q. So you would refer to the answer to the</p> <p>6 previous question?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Are you familiar with the provisional</p> <p>9 ballot?</p> <p>10 A. Oh, yeah.</p> <p>11 Q. Okay. Is it correct to say that SB 14</p> <p>12 provides that a provisional ballot will only be</p> <p>13 counted if a voter subsequently presents one of</p> <p>14 these six forms of acceptable ID required by SB</p> <p>15 14 to the registrar within six days after the</p> <p>16 election?</p> <p>17 A. Um-hum. Yes, that's there.</p> <p>18 Q. Is what I just said a correct --</p> <p>19 A. Yes, that is built into SB 14. Sorry.</p> <p>20 Q. Does the Texas NAACP contend that the</p> <p>21 six-day allowance imposes a burden?</p> <p>22 A. Yes.</p> <p>23 Q. Why?</p> <p>24 A. Because instead of it being resolved at</p> <p>25 the -- at the election site, you are required to</p>	<p>138</p> <p>1 Q. So it's more of a burden to have to</p> <p>2 travel to the registrar to confirm a provisional</p> <p>3 ballot?</p> <p>4 A. Exactly what I'm saying.</p> <p>5 Q. Does the fact that you're only allowed</p> <p>6 six days to do that, does that impose a burden,</p> <p>7 the time limit allowed?</p> <p>8 A. I'm not seeing the days as necessarily</p> <p>9 a burden. I think just the fact that you do have</p> <p>10 to prove that you are who you say you are,</p> <p>11 through one of those six forms of ID, by going to</p> <p>12 an election department, a county election</p> <p>13 department, that is the burden within itself.</p> <p>14 Q. Where are election places normally?</p> <p>15 When we talk about polling places --</p> <p>16 A. Okay.</p> <p>17 Q. -- where are those -- can you give me</p> <p>18 an example of where those are held?</p> <p>19 A. For the purpose of early voting or just</p> <p>20 a regular election?</p> <p>21 Q. Either.</p> <p>22 A. During early voting, that's why we have</p> <p>23 always encountered our people to do early voting.</p> <p>24 They can go any place and vote within their</p> <p>25 county.</p>
<p>1 show up at a county election department to</p> <p>2 provide that information. The resolution to the</p> <p>3 problem cannot occur anywhere but at the election</p> <p>4 department after that election has been</p> <p>5 completed.</p> <p>6 So, once again, we're talking about</p> <p>7 resources diverted to go to the election</p> <p>8 department, which again, is not in our</p> <p>9 neighborhood, and you have to have transportation</p> <p>10 to get there and their hours are even less than</p> <p>11 the Department of Public Safety. Theirs are 8:00</p> <p>12 to 5:00.</p> <p>13 Q. Is it your position that it wouldn't be</p> <p>14 a burden if you had to return to the polling</p> <p>15 place?</p> <p>16 A. I think it would be less of a burden if</p> <p>17 you could do it that same day and do the</p> <p>18 resolution.</p> <p>19 Q. It would be less of a burden?</p> <p>20 A. Yeah, less of a burden.</p> <p>21 Q. Do you still have to travel to the</p> <p>22 polling place?</p> <p>23 A. Well, the polling places are usually in</p> <p>24 our neighborhoods because we're divided into</p> <p>25 precincts.</p>	<p>139</p> <p>141</p> <p>1 Q. Um-hum.</p> <p>2 A. So that makes it a lot easier for</p> <p>3 people to actually show up and vote.</p> <p>4 During the regularly scheduled</p> <p>5 election, you have to go to an assigned precinct,</p> <p>6 and if you move or if they decide to change the</p> <p>7 location of the voting precinct -- but it's</p> <p>8 always in closer proximity to where the person</p> <p>9 lives.</p> <p>10 Q. So I guess what I'm kind of getting at,</p> <p>11 are they held in elementary schools sometimes?</p> <p>12 A. Usually.</p> <p>13 Q. Or local public libraries?</p> <p>14 A. Um-hum. Yes.</p> <p>15 Q. Are they generally held in places that</p> <p>16 are open to the public?</p> <p>17 A. Yes.</p> <p>18 Q. Is it the Texas NAACP's position that</p> <p>19 it would be less of a burden if you were able to</p> <p>20 prove a provisional ballot by going back to an</p> <p>21 election polling place than it is to go to the</p> <p>22 registrar?</p> <p>23 A. I would say definitely.</p> <p>24 Q. So would the Texas NAACP prefer that a</p> <p>25 polling place be kept open at one of these public</p>

<p>1 places in order to confirm provisional ballots?</p> <p>2 A. I can't speak for the entire</p> <p>3 association or our state conference.</p> <p>4 Q. But you have been designated to testify</p> <p>5 here on its behalf; is that correct?</p> <p>6 A. Yeah, but when I make the comment about</p> <p>7 the distance, the distance to your polling place</p> <p>8 is definitely going to be closer, in most</p> <p>9 instances, I would say 90 percent, is going to be</p> <p>10 closer than your election department.</p> <p>11 So by virtue of that, it creates a</p> <p>12 greater hardship than if you were going back to</p> <p>13 the voting location where the issue arose.</p> <p>14 Q. Would it be less of a burden if voters</p> <p>15 were given 12 days to confirm a provisional</p> <p>16 ballot as opposed to six?</p> <p>17 A. I don't think that's going to make a</p> <p>18 lot of difference one way or the other. You</p> <p>19 still have the expense incurred with getting to</p> <p>20 the location and the expense incurred taking off</p> <p>21 work to get there.</p> <p>22 Q. Does the Texas NAACP support the idea</p> <p>23 of a provisional ballot?</p> <p>24 A. With the absence of anything else, I've</p> <p>25 never heard an official position.</p>	<p>142</p> <p>1 understanding of the purpose of a provisional</p> <p>2 ballot?</p> <p>3 A. To allow someone to exercise their</p> <p>4 right to vote, and this is sort of like the last</p> <p>5 stop along that way, if the person cannot provide</p> <p>6 adequate identification or whatever is needed to</p> <p>7 vote, then they are allowed to cast this ballot</p> <p>8 and the ballot is separated, segregated from all</p> <p>9 of other ballots that are going to be counted.</p> <p>10 And they're contained separately in a box, and</p> <p>11 then they're taken down to the county election</p> <p>12 department, and as you stated, they have a</p> <p>13 certain number of days to go there and provide</p> <p>14 additional proof that they, in fact, were</p> <p>15 authorized to vote.</p> <p>16 Q. Have you ever had to cast a provisional</p> <p>17 ballot?</p> <p>18 A. Never.</p> <p>19 Q. Does the Texas NAACP claim that</p> <p>20 minority citizens are less likely to be</p> <p>21 appropriately educated about the change in</p> <p>22 requirements for voting?</p> <p>23 A. I would have to say yes.</p> <p>24 Q. And what is that claim based on?</p> <p>25 A. It's based on the fact that our people</p>
<p>1 Q. Do you think provisional ballots are</p> <p>2 important?</p> <p>3 A. As a precinct chair, I would say yes.</p> <p>4 But I also, as a precinct chair, know that most</p> <p>5 of the times those ballots are never counted.</p> <p>6 Q. Provisional ballots are never counted?</p> <p>7 A. Very seldom.</p> <p>8 Q. Why is that?</p> <p>9 A. Because people do not come back or go</p> <p>10 back into an election department and the</p> <p>11 elections have already been decided by the time</p> <p>12 they go back. That's another thing. Those</p> <p>13 elections are decided the same evening, if not</p> <p>14 early the next morning, so six days or 12 days</p> <p>15 really isn't going to make a whole lot of</p> <p>16 difference if you do show up.</p> <p>17 Q. You don't think that provisional</p> <p>18 ballots make a difference?</p> <p>19 A. I don't think they've made any</p> <p>20 differences in my history with voting. I've</p> <p>21 never known provisional ballots that have</p> <p>22 impacted the outcome of an election. Now, that's</p> <p>23 not to say it hasn't happened somewhere else, but</p> <p>24 it's not -- it's not part of what I know.</p> <p>25 Q. Just to confirm, what is your</p>	<p>143</p> <p>145</p> <p>1 do not have the same level of computer literacy</p> <p>2 as the rest of the population, whether that's</p> <p>3 because of socioeconomic factors, they can't</p> <p>4 afford a computer or cannot afford the internet</p> <p>5 services that are needed to operate and acquire</p> <p>6 this information.</p> <p>7 I still send faxes to people,</p> <p>8 branch presidents who do not have or cannot</p> <p>9 operate, because of age. And a lot of older</p> <p>10 people have mastered, you know, the computer</p> <p>11 system, but then we do have some older ones who</p> <p>12 just have not given into that, for whatever</p> <p>13 reason.</p> <p>14 Q. Do you think education about voter</p> <p>15 requirements can only be accomplished through the</p> <p>16 use of a computer?</p> <p>17 A. No. No.</p> <p>18 Q. What other ways might someone be</p> <p>19 educated about voter requirements?</p> <p>20 A. We -- that's why I told you that the</p> <p>21 recruiting efforts by our branches, which always</p> <p>22 have membership recruiting, that is, have always</p> <p>23 included voter registration card because that's</p> <p>24 part of our mission.</p> <p>25 Now, we also do the education piece</p>

<p>1 about voter ID. That is a necessity because we 2 are trying to reach out to people in our 3 community, whether it's through the churches or 4 whether other events that are going on in the 5 community, concerts, wherever we can reach the 6 masses, we go.</p> <p>7 Q. Does the Texas NAACP contend that 8 minority citizens are more likely to fall victim 9 to the discretionary application of voter ID 10 laws?</p> <p>11 A. I would think so.</p> <p>12 Q. And what is that claim based on?</p> <p>13 A. The fact -- the e-mail that you brought 14 up earlier. The issue with Phyllis that was 15 stated about the requirements about the driver's 16 license scanning. Now, there's no question 17 Phyllis wouldn't have been disenfranchised 18 because Phyllis is not a person who had been put 19 off, as Exhibit 4 -- it says, "Phyllis indicated 20 they attempted to scan her driver's license and 21 it would not scan, so they used her voter 22 registration card as proof of who she was."</p> <p>23 So, you know, it's -- a lot of 24 people have had that issue, and there was 25 different activities -- that's the thing, when</p>	<p>146</p> <p>1 "Early voting started on Monday and 2 President Bledsoe was trying to see if there was 3 a standard of ID in voters. Phyllis indicated 4 they attempted to scan her driver's license and 5 it would not scan, so they used her voter 6 registration card."</p> <p>7 Q. Yes.</p> <p>8 A. And then she also talked about early 9 voting. So there -- I mean, there have been 10 various and sundry rules that have been 11 imposed -- and, again, it's discretionary by the 12 election judge as to whether or not that person's 13 identification is adequate or not.</p> <p>14 Q. I understand that point you're making. 15 You've referred to this e-mail recounting 16 Phyllis's story --</p> <p>17 A. Um-hum.</p> <p>18 Q. -- as evidence of such discretionary 19 application of those laws.</p> <p>20 A. Um-hum.</p> <p>21 Q. Could you point to me exactly which 22 part of this story that happened to Phyllis 23 involves discretionary application of laws.</p> <p>24 A. What happened to her, and look at what 25 happened to me. Two different voting locations.</p>
<p>147</p> <p>1 you allow human discretion, some precinct 2 election officials, you know, they'll say, okay, 3 this is close enough. And then there are others 4 who will say, no, you know, we need exact, so 5 you're going to have to sign off on this or 6 you're going to have to vote a provisional 7 ballot. It's totally discretionary with an 8 election judge.</p> <p>9 So, yes, that is one of our 10 contentions for sure.</p> <p>11 Q. I want to go back to that e-mail about 12 Phyllis.</p> <p>13 A. Um-hum.</p> <p>14 Q. I'm sorry, I'm trying to locate it.</p> <p>15 A. It's Exhibit 4.</p> <p>16 Q. Okay. Are you referring to page 2 of 17 Exhibit 4, the paragraph -- I'll let you get 18 there.</p> <p>19 A. (Witness complied.)</p> <p>20 Q. Could you point to a specific -- I'm 21 looking at page 2, the paragraph beginning, "No 22 one tried to scan my driver's license."</p> <p>23 A. Go back to page 1 of Exhibit 4. Under 24 the list of the recipients for that e-mail, it 25 says, "early voting."</p>	<p>149</p> <p>1 One voting location was scanning driver's 2 license, and when they couldn't -- if she hadn't 3 had her voter registration card, she may not have 4 been able to vote, but she happened to carry it.</p> <p>5 And then you look at what happened 6 when I went to vote and my ID did not match what 7 was on the voter's roll. My driver's license 8 does not match what they have on their voter's 9 roll.</p> <p>10 Q. At what point was there a discretionary 11 application of the law made in those two stories?</p> <p>12 A. Well, they made a decision that they 13 would accept only -- if she didn't have the 14 driver's license -- I mean, the driver's license 15 would not scan, which they wanted a copy of.</p> <p>16 They made a decision that, okay, we 17 need that information in order for you to vote, 18 obviously, so we can use your voter registration 19 card. What if she had not had her voter 20 registration card and the driver's license did 21 not scan. Someone could have exercised the, you 22 know, decision not to have allowed her to vote.</p> <p>23 Q. Are you required to have a voter 24 registration card to vote?</p> <p>25 A. Not -- I don't think you do anymore. I</p>

	150	
<p>1 think all you need is an ID and it has to match 2 what's on the voter's roll. 3 Q. So in both of these stories, both the 4 story that happened to you and Phyllis, y'all 5 were both able to vote, correct? 6 A. Yeah. We were definitely both able to 7 vote. 8 Q. Okay. So were y'all harmed in any way 9 in these two specific instances? 10 A. No. But that is an example of 11 discretion by the people who are conducting the 12 election, as to what they want and what they do 13 not want. 14 Q. In these two stories, if the machine 15 were able to scan the driver's license, would 16 there have been -- what would have happened then? 17 A. I'm sure everything would have been 18 fine, I mean, because that was what the necessity 19 was or that particular election judge to allow 20 her to vote. 21 Q. So the problem occurred when the 22 machine couldn't scan the driver's license? 23 A. Apparently. 24 Q. Okay. So after that happened, at what 25 point did the election official use his or her</p>	<p>1 Q. A prerequisite to voting. 2 A. Well, you have to have a voter 3 identification to vote. Is that what you're 4 referencing? 5 Q. I'm refer -- I'm referencing the 6 requirements of SB 14. 7 A. You have to have voter identification 8 to vote, which is mandated in SB 14. 9 Q. And does the Texas NAACP contend that 10 that mandate denies or abridges the right to vote 11 on the account of race or membership in a 12 language minority group? 13 A. I think it definitely presents 14 impediments. 15 Q. And what is the basis for that claim? 16 A. The costs associated with acquiring the 17 needed identification to vote. You don't even 18 need a voter's certifi -- voter registration 19 card to go vote. You have one of those six forms 20 of identification that must match something 21 that's written on the voter's roll. 22 Q. Is the claim that SB 14 will deny or 23 abridge the right to vote on account of race or 24 membership in a language minority group based 25 on -- is that claim based on any kind of study</p>	
	151	153
<p>1 own discretion to apply a voter law? 2 A. Mr. Tatum, I can't tell you exactly at 3 what point they made the decision that she had a 4 voter registration card that would allow her to 5 vote. I really don't know that. I wasn't there. 6 Q. Okay. 7 A. Okay? I'm only relaying what she told 8 us. 9 Q. Do you know what discretionary law was 10 being applied in that instance? 11 A. I'm not sure. 12 Q. Okay. 13 A. If there was a law other than this, it 14 was a decision made by the election judge. 15 Q. So in that case, the ultimate decision 16 that was made by the election judge was to allow 17 both you and Phyllis to vote? 18 A. Not the same election judge now. Two 19 different election judges. 20 Q. Right. The respective election judges. 21 A. Yes. Um-hum. 22 Q. Does the Texas NAACP contend that the 23 requirements of SB 14 constitute a prerequisite 24 to voting? 25 A. Constitute . . .</p>	<p>1 conducted by the NAACP or anyone else? 2 A. I'm not sure of that. 3 Q. Is that based on conversations that 4 members of the Texas NAACP executive committee 5 have had with members of the Texas NAACP? 6 A. I would say that that would be true. 7 Q. Does the Texas NAACP contend that SB 14 8 makes it impossible for anyone to vote? 9 A. No. I wouldn't say impossible. That's 10 really extreme. No. 11 Q. Does the Texas NAACP contend that SB 14 12 forces eligible voters to choose between voting 13 and other uses of their limited time and 14 resources? 15 A. Definitely. Yes. 16 Q. How does SB 14 force an eligible voter 17 to choose between voting and using their other 18 time? 19 A. Time that they expend going to or from 20 a DPS office, waiting two to three hours to 21 receive service. Sometimes even after being 22 there two or three hours, not receiving services 23 because they lacked a document that's needed; if 24 they're not adequately informed about the 25 expectations and requirements.</p>	

<p>1 That's why we have worked really 2 diligently to try to make -- ensure that when 3 people do show up, take off from work, expend the 4 financial resources to get to a location, that 5 they are adequately prepared for obtaining the 6 document that they need to vote.</p> <p>7 Q. Before SB 14, did a voter have to 8 choose between voting and doing something else?</p> <p>9 A. Not really, because the voting 10 locations are open after traditional work hours. 11 So they could vote after work. The polls usually 12 open before they go to work. And early voting, 13 you can vote on Saturday and Sunday. You cannot 14 go to DPS on Saturday and Sunday and get these 15 documents that we need to vote.</p> <p>16 Q. Would you agree that everyone must make 17 a conscious choice to vote at some point?</p> <p>18 A. Yeah. I think you're right about that. 19 Yes.</p> <p>20 Q. Do you think that choice must be made, 21 irrespective of the laws there in place at that 22 time?</p> <p>23 A. When you have -- God, I wish I could 24 remember the statement. When you have laws that 25 unnecessarily burden the people, poll taxes, "how</p>	<p>154</p> <p>1 And I'm sorry, I really thought you 2 knew what I was talking about when I was saying 3 "bubbles in a bar of soap."</p> <p>4 Q. That's okay.</p> <p>5 Are you aware of any members of the 6 Texas NAACP that are registered to vote but have 7 chosen not to vote as a result of SB 14?</p> <p>8 A. No.</p> <p>9 Q. Do you know anyone who is registered to 10 vote but has made the conscious choice to not 11 vote because of SB 14?</p> <p>12 A. Sort of as a protest perhaps? No, I've 13 never even heard of that concept of someone not 14 voting because of SB 14. I mean, that's so 15 alien. No. I've never even thought about it.</p> <p>16 Q. Does the Texas NAACP not contend that 17 SB 14 forces people to choose between voting and 18 not voting?</p> <p>19 A. I think circumstances.</p> <p>20 Q. What do you mean by that?</p> <p>21 A. Circumstances would cause people to not 22 have gone, perhaps, and gotten the necessary 23 documents that they need to vote. So I think 24 there are people who probably -- I don't know 25 them personally, and I want to make sure you</p>
<p>155</p> <p>1 many bubbles are in a bar of soap," those kinds 2 of laws.</p> <p>3 Q. Could you explain a "how many bubbles 4 are in a bar of soap" type of law?</p> <p>5 A. Yeah. It was a way of assessing 6 whether or not you had the capacity to vote.</p> <p>7 Q. I'd never heard that expression.</p> <p>8 A. You've never heard that before?</p> <p>9 Q. No, I have not.</p> <p>10 A. You're younger than I am, a lot 11 younger.</p> <p>12 There was actually a test that used 13 to be administered to African-Americans, and one 14 of the common -- I mean, across the country -- 15 especially in the south, one of the questions 16 that was asked of individuals in order for them 17 to get a voter registration card was, "How many 18 bubbles are in a bar of soap?"</p> <p>19 And you look like you're a very 20 well-educated man. Why don't you tell me how 21 many bubbles you think were in a bar of soap? 22 Nobody knows that. You talk about a 23 discretionary answer -- I mean question. I mean, 24 whatever the answer is, it was probably wrong 25 anyhow, to disenfranchise people from voting.</p>	<p>157</p> <p>1 understand that.</p> <p>2 But when you think of the 3 circumstances involved, and, you know, I do a lot 4 of voter registration, and I've approached people 5 about registering and they're like, no, they've 6 got to have that voter ID, and I'm not going to 7 that DPS office. I can't take people to the DPS 8 office. I work a job, and I have 9 responsibilities, too.</p> <p>10 Q. Ms. Lydia, what do you believe is the 11 purpose of SB 14?</p> <p>12 A. I think the intent and purpose was to 13 disenfranchise some voters, and it happens to be 14 minorities.</p> <p>15 Q. So do you believe that SB 14 was 16 enacted with discriminatory intent -- 17 discriminatory intent?</p> <p>18 A. I do. I believe that.</p> <p>19 Q. Does the Texas NAACP contend that any 20 legislature who voted for SB 14 acted with 21 discriminatory intent?</p> <p>22 A. I think that by virtue of their vote 23 and the impact that it would have on certain 24 minorities in the state, I think there was an 25 intent by those legislators to be a part and</p>

	158		160
<p>1 parcel of that.</p> <p>2 Q. Does the Texas NAACP contend that the 3 Texas legislature intended to harm minority 4 groups with the enactment of SB 14?</p> <p>5 A. If harm is defined as minimizing their 6 votes within the state, yes.</p> <p>7 Q. Are you aware of any polls taken by the 8 NAACP or any other entity that indicate whether 9 SB 14 is a politically popular bill?</p> <p>10 A. No.</p> <p>11 Q. Does the Texas NAACP support voter ID 12 requirements of any kind?</p> <p>13 A. I think citizenship requirements.</p> <p>14 Q. Does the Texas NAACP support voter 15 photo ID requirements of any kind?</p> <p>16 A. I don't think that should be a 17 prerequisite to vote, that you have a picture on 18 a card. My citizenship alone should entitle me 19 to vote.</p> <p>20 Q. Does the Texas NAACP contend that a 21 person who is trying to vote should be the same 22 person who is registered to vote?</p> <p>23 A. Of course. We don't -- we're not 24 fostering voter fraud.</p> <p>25 Q. I don't think I've already asked this</p>		<p>1 Marion County Election Board?</p> <p>2 A. No.</p> <p>3 Q. You're not aware of that law?</p> <p>4 A. No.</p> <p>5 Q. Do you -- with regard to voter ID laws 6 being proposed in other states, does the Texas 7 NAACP reach out to other branches of the NAACP in 8 those states to discuss concerns or share 9 information about voter ID legislation?</p> <p>10 A. Yes, we definitely do.</p> <p>11 Q. And who is in charge of doing that at 12 the Texas NAACP?</p> <p>13 A. Well, it's not so much somebody being 14 in charge of it. We have national conventions 15 and regional conferences where we do discuss the 16 various legislative activities that are going on, 17 and then we have a legislative arm of the NAACP 18 that also filters down information to us about 19 what's going on in other states regarding to any 20 type of legislation.</p> <p>21 Q. And in that process, has there ever 22 been an exchange of material between Texas NAACP 23 and NAACP conferences in other states?</p> <p>24 A. I'm really not sure on that. I would 25 think that we -- that they know about legislation</p>	
<p>1 question. If I have, please let me know.</p> <p>2 A. Okay.</p> <p>3 Q. To your knowledge, have any Texas NAACP 4 members ever expressed support for SB 14?</p> <p>5 A. I have never heard anyone personally 6 say they support SB 14, in the minority 7 community.</p> <p>8 Q. Okay. I've got one follow-up question.</p> <p>9 A. Okay.</p> <p>10 Q. We're going to take a trip back to the 11 beginning parts of this deposition.</p> <p>12 A. Oh, okay.</p> <p>13 Q. When we're talking about the NAAC -- 14 Texas NAACP's activities with regard to voter ID 15 legislation, its legislative activities --</p> <p>16 A. Um-hum.</p> <p>17 Q. -- not just with respect to SB 14 but 18 any legislation --</p> <p>19 A. Okay.</p> <p>20 Q. -- does the Texas NAACP track or 21 monitor voter ID laws in other states?</p> <p>22 A. Yes, we do.</p> <p>23 Q. Are you aware of the voter ID law in 24 the state of Indiana that was the subject of a 25 case titled Crawford versus I believe it was</p>	159		161

162

1 Q. No.
 2 MR. TATUM: Well, I have no more
 3 questions. I pass the witness.
 4 MS. RUDD: I have no questions.
 5 MS. MILLER: No questions from the
 6 United States.
 7 MR. TATUM: Well, we'll reserve
 8 further questions, and I believe we can go off
 9 the record now.
 10 THE COURT REPORTER: Would you like
 11 the witness to read and sign her deposition?
 12 MS. RUDD: Yes, ma'am.
 13 THE COURT REPORTER: And may I send
 14 it to you?
 15 MS. RUDD: You may.

16
 17
 18 (The deposition concluded on
 19 June 6, 2014, at 1:11 p.m.)
 20
 21
 22
 23
 24
 25

164

1 I, LINDA LYDIA, have read the foregoing
 2 deposition and hereby affix my signature that
 3 same is true and correct, except as noted above.
 4
 5
 6
 7 _____ LINDA LYDIA
 8
 9 THE STATE OF: _____
 10 COUNTY OF: _____
 11
 12 Before me, _____, on this
 13 day personally appeared
 14 LINDA LYDIA,
 15 known to me (or proved to me under oath or
 16 through
 17 _____) to be
 18 the person whose name is subscribed to the
 19 foregoing instrument and acknowledged to me that
 20 they executed the same for the purposes and
 21 consideration therein expressed.
 22 Given under my hand and seal of office this
 23 _____ day of _____, 2014.
 24
 25

163

1 CHANGES AND SIGNATURE
 2 LINDA LYDIA - JUNE 6, 2014
 3 PAGE-LINE | CHANGE REASON
 4 _____
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

165

1 STATE OF TEXAS)
 2 COUNTY OF DENTON)
 3
 4 REPORTER'S CERTIFICATION
 5
 6 I, Karen L. D. Schoeve, Registered
 7 Diplomatic Reporter and Certified Realtime
 8 Reporter residing in the State of Texas, do
 9 hereby certify:
 10 That the foregoing deposition of LINDA
 11 LYDIA was taken before me at the time and place
 12 herein set forth and that the witness was put
 13 under oath by me;
 14
 15 That the testimony of the witness and all
 16 objections made at the time of the examination
 17 were recorded stenographically by me, were
 18 thereafter transcribed under my direction and
 19 supervision and that the foregoing is a true
 20 record of same, to the best of my ability.
 21
 22 I further certify that I am neither counsel
 23 for nor related to any party to said action, nor
 24 in any way interested in the outcome thereof.
 25 In witness whereof, I have subscribed my
 name this 9th day of June, 2014.

17
 18
 19
 20
 21
 22 Karen L. D. Schoeve, RDR, CRR
 Integrity Legal Support Solutions
 Firm Registration No. 528
 23 3100 W. Slaughter Lane, Suite A-101
 Austin, Texas 78748
 24 (512) 320-8690
 (512) 320-8692 (fax)
 25

<p>\$</p> <hr/> <p>\$500 61:2</p> <hr/> <p> </p> <hr/> <p> 163:3</p> <hr/> <p>1</p> <hr/> <p>1 6:3 13:21,24 15:18 147:23</p> <p>1,000 84:1</p> <p>1:11 3:7 162:19</p> <p>10 30:15</p> <p>10,000 33:6</p> <p>105 6:11</p> <p>11:40 125:11</p> <p>113 6:13</p> <p>116 6:15</p> <p>119 6:17</p> <p>12 17:24 18:11 142:15 143:14</p> <p>122 6:19</p> <p>126 5:9</p> <p>13 6:3 17:25 18:11</p> <p>1332 7:24</p> <p>14 18:1,11 36:22,23,24 37:2,5,8,15 39:9 57:4 58:5 59:9 64:5,19 65:20,21 66:3,25 67:12,17 68:6 69:19 70:15,19 71:24 72:3,16 73:2 75:6,7,21 76:3 77:4,12 78:21 79:5 82:7,15 83:17 84:11 85:13 90:15,23 91:13 92:5,9 93:20,21 94:4,6 97:20 126:8,16 127:11,25 128:20 129:1,13,21 130:15,18 134:20 135:7,19 136:1 138:11,15,19 151:23</p>	<p>152:6,8,22 153:7,11,16 154:7 156:7,11,14,17 157:11,15,20 158:4,9 159:4,6,17</p> <p>14-related 65:17 78:11</p> <p>14th 4:9 135:16</p> <p>15 12:19 18:2,11 46:17</p> <p>163 5:11</p> <p>165 5:12</p> <p>17 18:3,13</p> <p>17th 17:19</p> <p>18 15:25 18:4,11 34:8</p> <p>19 6:5</p> <p>1950 8:2</p> <p>1st 82:24</p> <hr/> <p>2</p> <hr/> <p>2 6:5 19:6,9 115:14 130:3,12 147:16,21</p> <p>2:13-CV-193 1:8 7:14</p> <p>2:13-CV-263 1:19</p> <p>2:13-CV-291 2:5</p> <p>2:13-CV-348 2:14</p> <p>20 12:19 23:25 30:16</p> <p>2006 21:3</p> <p>2011 36:24 67:21 85:9</p> <p>2012 82:9,24 83:6,11</p> <p>2013 17:19 50:13 77:16 81:23 84:18 95:6,11 99:21 113:5</p> <p>2014 2:24 3:6 6:16 82:2 95:12 106:6 116:19 162:19 163:2 164:18 165:16</p> <p>202 4:18</p> <p>20530 4:17</p>	<p>209 4:9</p> <p>21 18:5,12</p> <p>2'13 50:15,16</p> <p>213.808.5700 4:5</p> <p>213.808.5760 4:5</p> <p>2200 3:10</p> <p>23 18:6,12</p> <p>23rd 113:5</p> <p>24 15:18 18:7,12</p> <p>25 6:16</p> <p>25th 99:21 106:5</p> <p>2nd 95:5</p> <hr/> <p>3</p> <hr/> <p>3 6:7 15:25 17:22 18:11 94:10,13 115:19</p> <p>3100 4:23 165:23</p> <p>320-8690 4:24 165:24</p> <p>320-8692 4:25 165:24</p> <p>37th 4:4</p> <p>3rd 8:2</p> <hr/> <p>4</p> <hr/> <p>4 5:4 6:9 15:25 17:23 18:11 72:3 99:1,4 146:19 147:15,17,23</p> <p>40 25:11 30:17</p> <hr/> <p>5</p> <hr/> <p>5 6:11 15:9 105:19,22</p> <p>5:00 139:12</p> <p>500 61:3 84:1</p> <p>512 4:24,25 165:24</p> <p>512.463.3133 4:10</p> <p>514-2919 4:18</p> <p>528 4:23 165:22</p> <p>5th 4:4</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p style="text-align: center;">6</p> <hr/> <p>6 2:24 3:6 6:13 113:17,20 162:19 163:2</p> <p>60 79:9,12</p> <p>6031 6:10</p> <p>6036 6:12</p> <p>6039 6:8</p> <p>6043 117:11</p> <p>6063 6:18</p> <p>633 4:4</p> <p>6th 7:18</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 5:6 6:15 18:9,11 116:7,10</p> <p>7204 4:17</p> <p>75116 7:25</p> <p>78711 4:10</p> <p>78748 4:24 165:23</p> <p>7-Eleven 60:21</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 6:17 15:19 119:15,18</p> <p>8:00 139:11</p> <p>8:48 3:7 7:18</p> <p>80 79:10</p> <p>817.713.9492 4:11</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 6:19 122:4,7</p> <p>9:00 110:21</p> <p>90 142:9</p> <p>90071-2013 4:4</p> <p>9-17 117:16</p> <p>94 6:7</p> <p>950 4:16</p>	<p>99 6:9</p> <p>9th 165:16</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>a.m 3:7</p> <p>A-101 4:23 165:23</p> <p>ability 9:22 10:2 84:25 165:13</p> <p>able 16:14,20 115:16 134:19 137:23 141:19 149:4 150:5,6,15 161:15</p> <p>above-styled 3:6</p> <p>abridge 152:23</p> <p>abridges 152:10</p> <p>absence 142:24</p> <p>absentee 89:3</p> <p>absolute 39:15</p> <p>absolutely 67:5 81:20 129:6</p> <p>Academic 23:10</p> <p>accept 149:13</p> <p>acceptable 127:24 128:19,25 135:25 137:24 138:14</p> <p>access 112:20</p> <p>accessibility 132:7</p> <p>accidentally 11:4</p> <p>accomplish 80:21 121:18</p> <p>accomplished 145:15</p> <p>account 152:11,23</p> <p>accurate 9:23 10:2 104:12 107:6 117:19</p> <p>accurately 10:6 106:8</p> <p>acknowledged 164:16</p> <p>acquire 38:17 108:20 136:25 137:9,10 145:5</p>	<p>acquiring 40:1 107:3,19 152:16</p> <p>across 57:9 81:19 100:9 107:5 134:6 155:14</p> <p>act 21:8</p> <p>acted 66:25 157:20</p> <p>action 1:7,18 2:4,13 6:14 52:9,11,20 54:16,21,25 56:6 59:19 65:1 106:17 111:3 114:4,5 165:14</p> <p>actions 74:24 124:24</p> <p>actively 77:17 127:22</p> <p>activities 22:24 26:22 32:4 33:21 36:3 51:11 55:4 57:2,14,20 59:23,25 60:3,15 63:12 71:3,5,25 73:21 75:8 78:24,25 79:4 81:10 87:9 88:10 89:19 90:21 91:6,12,24 92:20,22 93:25 94:1,2,4 126:7,15,22 127:2,3,12 133:14 146:25 159:14,15 160:16 161:4,8</p> <p>activity 79:1 97:4</p> <p>acts 35:7</p> <p>ACT-SO 23:10 56:9</p> <p>actual 42:23</p> <p>actually 12:23 24:11 27:21,23 30:13 46:14 50:14 61:10 64:3 67:24 81:4 84:5 85:1 86:1 87:3 103:3 108:23 121:2 125:9 141:3 155:12</p> <p>add 35:12 45:1 130:20</p> <p>added 76:1 134:21,24</p> <p>Adding 105:6</p> <p>addition 37:10</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

additional 40:2 74:6 144:14	agreed 112:16 129:18 agreement 129:25 130:8	amount 60:2,9 61:14,16 63:25 64:21 89:21 93:14 112:22
address 52:10 64:1,8,23 65:11,17 73:15,17 84:16 133:8	ahead 27:22 76:15 akin 46:7 alert 6:14 114:4,5 alien 156:15	amounts 135:8 ample 68:10 Amy 4:3 8:14,23,25 11:25 12:9,12,22 83:3
addressed 60:12	allocate 63:6 65:11 allocated 61:20,24 62:21 63:3 64:18 75:7 76:3 79:4 92:22 93:18	amy.rudd@dechert.com 4:6
addresses 99:18 100:11 106:3,14	allocating 76:16 78:11 allocation 62:8 65:15,16 93:22	analyses 59:7 ancillary 84:13 Anended 6:3
addressing 64:5,18 86:10 100:4	allocations 65:3 78:22 92:13 allow 8:22 11:5 68:19 101:9 144:3 147:1 150:19 151:4,16	Angela 4:14 8:13,14,21 124:2 130:4
adequate 136:16 144:6 148:13	allowance 138:21 allowed 45:7 97:9 101:20,22 140:5,7 144:7 149:22	angela.miller5@usdoj.gov 4:18
adequately 40:12 68:6 153:24 154:5	alone 158:18 already 13:19 21:5 64:6 77:10 94:3 126:17 127:3 143:11 158:25	Angeles 4:4 25:21 ANNA 1:4 annual 61:6 81:3,13
administered 155:13	am 8:4 24:11 30:25 31:4 32:20 38:6 42:18 43:5 68:14 96:5 101:14,22 117:14 132:9 134:2 155:10 165:14	annually 81:17 answer 10:15,20 11:17 15:7 40:17,18 46:24 47:20 68:7 69:4 70:9 133:1,25 138:5 155:23,24 161:23
administrative 27:24 60:10 79:9,12	amend 68:2 Amended 14:17 AMERICA 1:13 4:13	answered 21:5 answering 10:7,25 11:2,6 23:8
adult 34:6 46:12	American 1:6 2:3 49:16,25	answers 9:23 10:3 16:15 161:21
advised 125:20		anyhow 155:25
advisor 22:22,23 23:6,18		anymore 102:19 149:25
advisors 23:2		anyone 12:11,20 27:6 29:23 44:16 54:1 58:10 70:13 90:7 108:8 118:8 153:1,8 156:9 159:5
advocate 63:12		anyplace 89:8
advocating 77:18 120:15		anything 10:5 12:10
affect 9:22 10:2 55:19		
affiliated 25:12		
affix 164:2		
afford 79:17 145:4		
affordability 136:14		
African-Americans 133:18,22 155:13		
Afternoon 5:9 126:1		
against 77:18		
age 34:8 145:9		
agenda 85:3 87:25		
ago 12:16 20:25 21:2 39:7 85:19		

<p>13:18 22:18 23:5 42:5 58:17 63:6 85:25 86:3 94:9 112:7 120:14 132:25 135:13 137:16 142:24 161:22</p> <p>Anytime 76:25</p> <p>anywhere 46:21 136:13 139:3</p> <p>apart 36:14</p> <p>Apparently 150:23</p> <p>Appearances 5:4</p> <p>appeared 164:12</p> <p>appears 103:24 104:5 105:17 113:3</p> <p>application 146:9 148:19,23 149:11</p> <p>applied 151:10</p> <p>apply 26:1 89:3 111:12 136:24 151:1</p> <p>approached 157:4</p> <p>approaching 125:12</p> <p>appropriate 35:17</p> <p>appropriately 144:21</p> <p>approval 42:14 43:14 44:1,6,24 46:3 62:4 122:3</p> <p>approve 64:22</p> <p>approved 42:20 43:7,16,19,21,23 44:14 46:3 47:13 48:8 64:7 161:2</p> <p>approving 42:19</p> <p>approximately 22:15 33:6</p> <p>area 22:17 31:3 52:5 102:3 115:23</p> <p>arm 160:17</p> <p>arose 142:13</p> <p>aside 61:11,18</p>	<p>as-needed 62:22 63:2 75:3,5 92:23 93:18</p> <p>assessing 155:5</p> <p>assigned 89:9 141:5</p> <p>assist 19:23 28:2 31:23 34:24 47:7 68:23 84:3 88:5,8,10,18 90:10 128:14</p> <p>assistance 90:2 115:23 121:17</p> <p>assistant 7:11 28:2</p> <p>assisted 50:6 90:17 128:3,7</p> <p>assisting 91:7</p> <p>assistive 89:2</p> <p>associated</p> <p>131:10,12,20,21,24 132:12 152:16</p> <p>association 1:17 80:8 112:19 142:3</p> <p>AT&T 60:21</p> <p>attached 3:13</p> <p>attempted 100:25 146:20 148:4</p> <p>attend 28:20 42:12 83:24</p> <p>attended 4:13 96:12</p> <p>attending 63:21</p> <p>attorney 4:9,15 7:11 11:16,18 12:14</p> <p>attorney/client 47:19</p> <p>attorneys 42:7 73:14 83:22</p> <p>attract 31:17</p> <p>attracting 31:20</p> <p>audibly 10:15</p> <p>auspices 24:18</p> <p>Austin 4:10,24 27:17 29:20 52:5 63:22</p>	<p>68:20,23 85:10 165:23</p> <p>authority 67:1</p> <p>authorized 67:8 144:15</p> <p>automobiles 136:10</p> <p>available 29:14 46:20 48:19</p> <p>Ave 4:16</p> <p>Avenue 3:10</p> <p>average 30:14</p> <p>aware 16:10 40:7 45:13 49:2 56:22 59:6 71:15 76:24 87:18 129:11 130:22 156:5 158:7 159:23 160:3</p> <p>awareness 130:21</p> <hr/> <p style="text-align: center;">B</p> <p>ballot 74:23 101:9 104:10 113:14 138:9,12 140:3 141:20 142:16,23 144:2,7,8,17 147:7</p> <p>ballots 142:1 143:1,5,6,18,21 144:9</p> <p>bank 97:4,8</p> <p>banks 12:24 27:8 54:1 79:6 96:25 113:2 129:19</p> <p>bar 133:20 155:1,4,18,21 156:3</p> <p>BART 136:12</p> <p>base 80:11</p> <p>based 16:15 19:11 44:6 49:20 59:12 69:7 86:19 96:6 137:15 144:24,25 146:12 152:24,25 153:3</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

bases 20:2	37:2,9 54:5 57:6 64:9 66:12,16 67:13 68:2 71:13,17 77:18 78:1 79:11 82:17,23 83:22 129:13,21 135:20 158:9	41:6,9 47:1,4 58:8 77:20 87:15 114:19 117:25 119:8,9,11 145:21 160:7
basically 61:19 94:2 100:2 117:8 122:20 123:2	bills 46:2,6 51:24 52:6 69:11 70:3 85:16	break 51:4,7 123:18 124:1 125:10 126:6,11
basis 21:9 23:12 29:12,15 47:19,22 60:13 61:21 62:22 92:23 93:18 136:3 138:2 152:15	binding 16:15	BRICKNER 1:5
Bates 6:8,10,12,14,18	birth 75:22,23 90:13 91:2,3 128:12,15 131:17 133:8	briefly 46:10 99:24
became 26:6 72:15 82:23	bit 51:13 100:20 101:15 133:24	bring 13:13 111:16 122:13
become 24:1 27:18 30:20 71:17 75:15 130:22	blatantly 134:1	brought 13:15 122:8 146:13
becomes 30:18	Bledsoe 12:14 27:19 29:9 42:7 103:25 148:2	bubbles 133:20 155:1,3,18,21 156:3
begin 9:12 43:4	bleed 53:19	budget 60:18,20,25 61:6
beginning 78:19 106:23 147:21 159:11	board 55:14 160:1	budgeted 60:16
behalf 16:11 54:1 142:5	Bob 104:15,16,18	budgeting 31:1
believe 19:11 22:13 28:3 62:17 66:18 69:19 83:6 131:23 132:11 135:11 157:10,15,18 159:25 162:8	Bob's 104:8 105:1	built 138:19
BELINDA 2:11	body 35:8	bullet 117:22 118:17
BENAVIDES 1:18	booth 88:12	burden 40:1 134:22,24 135:17 137:1 138:21 139:14,16,19,20 140:1,6,9,13 141:19 142:14 154:25
benefit 41:13 80:7	born 8:1	Bureau 131:19
BENJAMIN 1:6	bottom 15:12 95:8 98:1 117:10	BURNS 1:4
besides 12:11 44:16	Bow 7:24	bus 136:19 137:9
BESSIAKE 1:15	box 144:10	buses 136:20
best 19:3 41:21 106:9 124:6 128:3 135:18 165:13	branch 24:10,14,23 25:2,8,12 26:1 30:3,5,6 32:6,7 68:16 86:22 99:12,13,17 106:14 111:5,8 119:13 145:8	buy 26:4
better 68:7 78:21 93:8	branches 2:2 6:4 14:21 21:17,24 22:1 24:8,17,19 26:21 31:23 32:10 33:2,17,20 34:4,6 35:8 36:7,9 40:25	bylaws 28:13 120:20
beyond 12:6,10 50:7 51:15 85:24		<hr/> C <hr/>
bill 36:22,23,24		CA 4:4

<p>68:17 103:19 155:6</p> <p>capitol 53:14,15 69:17 70:2</p> <p>car 136:15,18</p> <p>card 37:11,17,25 38:3,5 40:3,5 72:2,6 74:12,14 75:18 76:19,20 101:2,5 131:25 132:6,13,15,18,21 133:2 134:13,24 135:2,5 145:23 146:22 148:6 149:3,19,20,24 151:4 152:19 155:17 158:18</p> <p>card-carrying 80:3</p> <p>cards 76:9,24 92:3 103:4,6,8 132:8</p> <p>careless 129:4</p> <p>CARRIER 1:3</p> <p>carry 37:17 51:19 149:4</p> <p>carrying 92:11 110:20 111:25</p> <p>case 1:9,21 2:6,15 7:14 11:17 21:23 47:16 48:9 117:16 129:7,14 151:15 159:25</p> <p>cases 7:16 41:15,18,19</p> <p>cast 113:14 144:7,16</p> <p>catch 136:19 137:8</p> <p>category 75:2</p> <p>Caucus 2:3 49:16 50:1</p> <p>cause 3:6 69:20 156:21</p> <p>causes 131:21</p> <p>caution 42:5</p> <p>caveat 130:20</p> <p>cc 111:6</p>	<p>certain 21:1 22:17 23:7 33:14 45:9 49:10,13 53:24 54:3 61:10,11,14,16 62:16 64:13 69:9 70:1,16 71:18 72:5 75:16 105:10,12,15 107:16 108:19 112:22 119:14 144:13 157:23</p> <p>certifi 152:18</p> <p>certificate 5:12 6:20 38:17 75:23,24 90:13 91:2,3 101:7 128:12,15</p> <p>certificates 107:4 131:17</p> <p>CERTIFICATION 165:4</p> <p>Certified 4:21 125:24 165:6</p> <p>certify 165:7,14</p> <p>chain 6:8,10,12 130:5,9</p> <p>chair 47:2,4 52:6,9 53:20 54:16,21,25 59:19 101:13,17,18,22 102:1,2,8,14,17,20 111:3 143:3,4</p> <p>chairs 26:19 46:16,17 47:8 55:24 58:19 59:3 85:7 106:17</p> <p>challenges 69:9,12,14,20,22 70:2,6</p> <p>chance 161:21</p> <p>change 71:24 77:5,8 86:19,21 141:6 144:21 163:3</p> <p>changed 66:4,7,10 80:25 86:24 135:20</p> <p>changes 5:11 66:20,21 67:4,7,9,14 71:12 74:10 76:5 77:1,2,13</p>	<p>85:24 163:1</p> <p>changing 63:9 69:2</p> <p>chapter 25:16</p> <p>chapters 24:20 26:22 34:10 47:5</p> <p>charge 36:2 52:24 160:11,14</p> <p>chemo 56:4 63:18</p> <p>choice 154:17,20 156:10</p> <p>choose 39:14 153:12,17 154:8 156:17</p> <p>chosen 156:7</p> <p>Christi 1:2 82:12,14 117:17</p> <p>church 115:15 121:3 132:8</p> <p>churches 32:8 89:13 146:3</p> <p>Circuit 117:18</p> <p>circumstances 156:19,21 157:3</p> <p>cities 81:1 107:18,23,25 108:4,23 110:13,14</p> <p>citizens 1:6 115:1,12 135:24,25 137:23,25 144:20 146:8</p> <p>citizenship 133:16 158:13,18</p> <p>city 108:24</p> <p>Civic 95:18,19</p> <p>civil 1:7,18 2:4,13 3:12 4:15 60:10 70:11</p> <p>claim 128:17 136:3 138:2 144:19,24 146:12 152:15,22,25</p> <p>claims 20:2</p> <p>clarification 11:11</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

47:25 82:22 clarified 80:16 clarifies 120:12 clarify 21:14 22:7 161:23 CLARK 1:15 clear 22:7 47:21 134:2 clinics 114:25 115:5 close 109:6 147:3 closer 141:8 142:8,10 closest 77:23 coalesce 121:12 122:3 coalesced 121:14 coalescing 122:2 coalition 121:13 co-chair 111:4 collaboration 85:5 collect 26:24 123:2 collected 124:13 college 22:25 24:20 25:16 26:22 30:4 34:10,11 46:13 47:5 61:16 color 51:24 combine 33:1 combined 53:1 comes 35:22,25 74:16 75:11 91:24 comment 142:6 COMMISSIONERS 1:18 commit 161:9 committed 74:7 126:16 committee 6:16 26:18,19 28:17,22,24 33:22 35:5 36:1 42:15,16,20 43:8,11,19,22 44:5,17,20 45:5,16	46:8,10,11,16,17,18, 20 47:8,10 49:7 52:17 53:20 55:23 58:10,19 59:3 62:3 63:11,24 64:16 66:12,13 85:6 104:24 109:21,24 112:16 116:18,21 124:9,23 125:1 153:4 committees 52:12 55:13,22,23,25 56:1,19,23 common 155:14 communicate 29:17,23 30:1 communication 26:16 communications 49:25 50:3 56:12 58:15,22 87:23 communities 52:23 71:17 127:14,19 community 49:20 51:25 55:3 64:24 77:1 81:7,11 85:17 86:2 91:22 94:9 102:4 132:9 136:5,8 146:3,5 159:7 compartment 72:20,23 74:7 77:10 compartmentalize 61:4 compartmentalized 72:12 compartments 73:2 compelling 137:13 compile 58:15 61:6 compiled 111:19 114:8 117:4 120:6 complaint 6:6 12:5 13:3,15 19:18,20 20:3 41:20 42:25 73:14 137:18,20 complaints 60:11	complete 71:7 128:15 completed 139:5 completely 17:4 complied 147:19 component 70:12 73:5,8 components 71:10 comprise 46:18 computer 145:1,4,10,16 computers 112:20 concealed 37:18 concept 156:13 concern 68:21 concerned 132:10 concerning 68:6 concerns 18:23 45:19 52:16 55:2 58:9 60:12 61:3 67:17 70:3 73:16,17 84:17 124:8 160:8 concerts 146:5 concluded 162:18 conclusion 40:17 conduct 55:16 63:11 71:6 97:3 102:18 108:13 124:17,20 conducted 107:12,22 108:21 109:14,19 110:2 118:6 124:12 126:22 127:10 153:1 conducting 56:23 150:11 conducts 79:2 conference 2:2 6:4 9:1 12:6,14,23 14:20 21:17 22:5 23:16 24:8,18,21 26:23 27:19 28:14 31:10 32:1 33:24 34:20 35:2,4 36:2,6 45:4
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

46:15 47:3 48:18 53:2 83:12,16 84:18 85:6,9 110:16,19,23 111:1,2 118:4 126:23 142:3 conferences 160:15,23 161:5 confidential 130:25 confirm 17:7 18:10,15 109:25 129:23 140:2 142:1,15 143:25 congregations 115:16 connection 9:7 conscious 154:17 156:10 consider 64:23 129:2 132:20 consideration 164:17 considered 45:20 59:7 75:8 84:5 considering 108:16 consisted 87:1 consistent 32:11 85:23 89:16 129:17,18 consistently 53:8 consolidated 1:20 2:6,15 7:16 constituent 80:11 constituents 88:11 90:10 128:18 constitute 151:23,25 constitution 120:20 constitutionally 27:7,9 28:5,9 34:1 constraints 68:4 contact 59:4 161:6 contacting 51:18 contain 106:13 contained 16:12,16	34:13,14 48:13 144:10 contemplate 161:21 contend 65:21 66:24 67:6,7 131:9 135:7,23 137:22 138:20 146:7 151:22 152:9 153:7,11 156:16 157:19 158:2,20 content 47:23,25 contention 67:11 109:5 contentions 147:10 contents 99:25 context 16:6 continue 161:15 CONTINUED 126:4 continuing 124:1,3 control 9:15 convention 30:16 35:25 81:3,6,12,25 82:9,13 84:6 85:11 86:16 95:25 106:24 107:2 112:12,14,15 conventions 27:3 83:25 84:2 85:4,19,20 86:5 87:11,22 160:14 conversations 29:19 42:6 45:24 153:3 coordinate 22:24 27:1 52:12 57:22 coordinating 57:25 58:2 coordinator 23:10 coordinators 114:25 copied 111:20 copy 13:25 111:21 119:17 122:9 131:18 149:15	corporate 32:17,19 Corporation 60:22 Corpus 1:2 82:12,13 83:12 117:17 correct 10:10 11:23,24 17:15 18:12 21:10,13,22 22:10 28:18,23 29:21 35:9 36:4 37:2 42:17 43:5,8,9,11,14,20 44:14,15 54:23 58:23 62:18,24 65:12 69:17 70:4 72:24 77:6 78:13,17 80:5 81:24 83:3 88:1 95:7,12 98:5 99:14,22,23 103:25 104:3,4,12,22 106:6,7 107:23 111:17 113:3,6 115:2 116:24 119:3,4 126:13 130:19 138:11,18 142:5 150:5 164:3 cost 131:20 132:1,15,21 costs 131:10,12,21,24 132:3,5,12 134:12 152:16 council 34:7 councils 24:20 26:21 47:4 counsel 11:23 41:10 165:14 count 74:23 counted 104:11 138:13 143:5,6 144:9 counties 84:15 country 30:8 133:16,23 137:5 155:14 county 1:7,17,18 89:8 98:2,21,22 100:3 102:10,11,14 103:11,15 109:2
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>133:5 139:1 140:12,25 144:11 160:1 164:10 165:2</p> <p>couple 63:21 107:17,23,24 108:23</p> <p>course 42:24 122:1 132:19 158:23</p> <p>court 1:1 4:20 7:15 10:16 162:10,13</p> <p>covered 126:9,10</p> <p>covers 52:22</p> <p>Crawford 159:25</p> <p>create 59:16 77:22 121:7,10,14</p> <p>created 34:19 55:12 76:6,13,20 109:7 121:5</p> <p>creates 55:13 142:11</p> <p>Creek 7:24</p> <p>crimes 124:9,15</p> <p>criminal 47:2,3 52:18 56:7 121:12</p> <p>CRR 3:8 165:21</p> <p>Cultural 23:11</p> <p>currently 8:3,5</p> <p>curve 78:4</p> <p>cycles 90:14</p> <hr/> <p style="text-align: center;">D</p> <p>daily 29:12,15</p> <p>Dallas 1:7 3:11 7:19 24:11,13 25:2,8,12,22,25 26:1 27:17 98:2,21,22 102:11,14 103:11,15</p> <p>Darden 7:22</p> <p>data 70:18 123:3 124:13 137:15</p> <p>date 12:17 22:16 43:3,15 110:2 133:8</p>	<p>dated 95:5</p> <p>dates 23:4</p> <p>Dating 53:9</p> <p>day 51:15 52:1,3,4,25 53:5,16,17,19 57:5,15 59:24 106:9 139:17 164:12,18 165:16</p> <p>days 12:16 46:2 68:21 138:15 140:6,8 142:15 143:14 144:13</p> <p>day-to-day 60:13</p> <p>DC 4:17</p> <p>deal 34:6 81:5,6 84:17</p> <p>dealing 75:19 81:6</p> <p>deals 85:16</p> <p>December 113:5</p> <p>DECHERT 4:3</p> <p>decide 74:19 141:6</p> <p>decided 86:16 107:2 143:11,13</p> <p>deciding 64:16</p> <p>decision 42:2 43:1,6 44:13 63:24 64:4,11 65:10 149:12,16,22 151:3,14,15</p> <p>decision-making 65:2</p> <p>decisions 35:13 62:2</p> <p>declaratory 6:6 19:18</p> <p>dedicated 60:4 74:25 78:12 92:21 93:6,10,13,16,22,23</p> <p>deep 79:18</p> <p>defendants 1:11,24 2:9,19 3:5 4:7 6:3 7:12 14:17 94:19 99:7 105:24 113:23 116:11 119:19 122:16</p> <p>defer 137:19</p>	<p>defined 158:5</p> <p>definitely 17:5 18:25 30:20 32:16 45:22 49:22 64:2 71:4 75:5 81:4 89:15 90:24 91:20 111:2 125:8 128:2 141:23 142:8 150:6 152:13 153:15 160:10</p> <p>degree 31:16</p> <p>DEL 2:13</p> <p>delayed 82:19</p> <p>DELEON 1:3</p> <p>delivered 128:11</p> <p>denied 39:20 72:8 118:20</p> <p>denies 152:10</p> <p>DENTON 165:2</p> <p>deny 152:22</p> <p>department 1:23 2:8,18 4:16 30:7 40:9 53:21 133:4 139:1,4,8,11 140:12,13 142:10 143:10 144:12</p> <p>departures 65:22</p> <p>depend 54:11</p> <p>depending 74:24</p> <p>depict 106:9</p> <p>depicted 100:21</p> <p>deposed 9:8</p> <p>deposition 2:22 3:3 6:4 7:17 9:15 12:4,12 13:1,5,9,21 14:18 15:1,23 16:7 19:6 94:10 99:1 105:19 113:17 116:7 119:15 122:4 159:11 162:11,18 164:2 165:8</p> <p>deputized 103:5</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

describe 73:2 99:24 102:1,17 107:14 136:6 described 57:21 74:7 90:19 100:21 107:11 127:4 describes 101:10 describing 111:16 DESCRIPTION 6:2 designate 28:1 designated 16:10 27:3 61:15 62:16 142:4 designation 130:25 designs 55:8 determination 100:7 develop 59:14,15,17 developed 59:12 77:19 development 56:16 devote 133:13 134:15 dictate 103:7 difference 142:18 143:16,18 differences 143:20 different 27:13 31:22 34:5 57:8,11 70:10,25 71:19 81:10,18 86:9 91:23 146:25 148:25 151:19 digits 137:4,6 diligently 154:2 dinner 50:9 Diplomate 4:22 165:6 direct 58:3 79:5 120:2 direction 165:12 directions 13:16 directly 57:25 97:20 Director 1:23 2:8,18	 disclosure 101:13 discretion 147:1 150:11 151:1 discretionary 74:15 93:19 146:9 147:7 148:11,18,23 149:10 151:9 155:23 discriminatory 157:17,21 discriminory 157:16 discuss 16:6 42:10 46:4 83:22 96:3 125:13 160:8,15 discussed 12:9 42:6,13 47:11 48:10,12 57:6 86:5,16 93:4 discussing 13:17 15:22 discussion 12:13,15,18,21,22 20:6 28:15 47:15 82:20 125:17 discussions 48:2,21,23 49:1,15 50:18,23 disenfranchise 155:25 157:13 disenfranchised 133:23 146:17 disenfranchising 133:19 disengage 108:15 disparity 137:7 disperse 114:13 dispersed 114:11 disproportionately 136:9 disqualified 74:22 distance 142:7 distanced 109:3	 distances 84:14 distant 127:18 distribute 120:10 121:9 distributed 120:23 District 1:1 7:15 divert 63:25 diverted 66:2 139:7 divided 139:24 division 1:2 4:15 30:4 46:14 document 14:6 18:16 19:12,15,17,24 28:10 94:16,19,22 99:4,7,8,10 103:21 105:23,25 106:13 110:17 112:25 113:22 114:1,3 116:10,14,16 117:4,8,10 118:11 119:22 120:5,9 121:2,5,15 122:16,17 153:23 154:6 documentation 38:20 90:4 108:20 111:16,17 133:11 135:4 documents 13:4,13 14:9 76:13 78:6 84:25 88:2 90:12 120:2 123:13 154:15 156:23 DOJ 8:13 dollar 61:14,16 64:21 dollars 61:11,19 92:14 done 11:3 23:12 31:22 35:14 53:7 55:14,21 66:15,22 71:18,19 73:24 90:8 92:12,15,17,19 107:17 108:5 118:8 128:2 doors 39:19
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

double 137:4	earned 39:16	136:24
doubt 45:18	ease 117:24 118:6	EICs 75:24
DPS 38:4,7,17	136:13	eight 20:25 21:2
77:23,24 84:8,13,15	easier 11:3 27:17	22:14 23:17 53:11
91:18 107:4	141:2	either 26:4 42:11
108:16,25 112:9,18	eat 78:22	114:10 115:13 123:9
123:4 131:13,14	Economic 56:16	127:22 130:12 140:21
136:19,21 137:1	edification 83:8	elaborate 37:7
153:20 154:14 157:7	educate 71:16 76:4	elected 20:16,18,23
draft 95:11 125:21,23	77:1,5 81:10 82:1	46:12
Drive 7:24	83:16 84:10 85:12	election 6:18,20
driver's 37:20 38:23	86:2 91:22 111:24	38:16 39:6
90:12 91:2 100:16	134:25	73:16,18,19 74:16
101:1,4,5 104:10	educated 144:21	89:10 90:14 107:3
133:9 146:15,20	145:19	119:25 124:9,14
147:22 148:4	educating 79:23 80:19	133:4 138:16,25
149:1,7,14,20	82:15 85:22 127:13	139:1,3,4,7
150:15,22	education 1:15	140:12,14,20
drives 71:6	52:6,8,19 56:10 59:4	141:5,21 142:10
driving 108:18	63:11 64:25 71:8	143:10,22 144:11
due 68:4	72:9,11,14,24	147:2,8 148:12
duly 3:5 7:4	73:5,6,7,8 74:4,8	150:12,19,25
Duncanville 7:25	75:15 77:3,11 79:20	151:14,16,18,19,20
during 27:4 30:16	86:10 94:8 126:9	160:1
43:1 50:6 51:16,18	145:14,25	elections 88:6
53:6,12,15 54:5	educational 61:2 87:9	90:18,22 98:2,21,23
55:15 58:4 63:3	94:2	102:19 143:11,13
67:18 70:17 73:16,17	effect 28:4,6	electoral 37:13
77:16,21 81:3,5	effective 82:23 84:22	elementary 141:11
83:16 84:10 86:4	effort 53:1 75:13	eligible 153:12,16
88:6 89:10 90:18	81:9 91:20 92:14	else 10:5 12:11,20
106:23 107:1 140:22	110:20 121:14	13:18 44:16 49:11
141:4	efforts 39:18 92:25	56:13 58:10,18 79:15
duties 26:14 30:10	112:24 114:19 126:20	86:1 91:23 94:9
102:16	145:21	142:24 143:23 153:1
<hr/>		154:8
E		
earlier 19:12 28:3	egregious 64:9 133:22	else's 121:3
70:1 75:4 80:1,17	EIC 6:20 37:20	e-mail 6:8,10,12
93:4 127:15 146:14	38:2,6,15 75:21 91:4	58:17 94:23 96:6,7
early 89:2,5,6	107:19 108:8,20	98:9 99:11,18,20,25
140:19,22,23 143:14	111:15 112:1	100:10,11 103:24
147:25 148:1,8	118:15,16,25 122:21	105:7
154:12	123:5 126:12	106:2,3,8,12,14
	131:10,22 132:4,22	112:5 113:2,9,12

114:13,15 130:5,9 146:13 147:11,24 148:15 e-mailed 8:20 120:24 e-mails 29:19 58:13,14 87:24 employed 8:3,5 20:11 employee 89:23 employees 31:7 employment 20:8 empowerment 71:7 enable 85:1 enact 66:10 enacted 58:4 65:21 76:7 108:5 157:16 enacting 66:25 enactment 57:4 59:9 65:20 66:3 82:18 134:20 158:4 encompassed 130:9 encountered 78:2 140:23 encourage 89:6 encouraged 58:8 90:10 encouraging 73:11 97:17 encumbrance 135:14 engage 71:2 88:9 engaged 94:5 Engagement 95:18,19 engages 87:10 engaging 73:21 ensure 66:15 71:14 87:6 112:23 154:2 Ensuring 51:23 entail 83:19 ENTERO 2:13 entire 142:2	entirety 69:5 entitle 158:18 entitled 15:13 76:12 entity 158:8 equality 51:23 especially 133:17 155:15 ESPINOSA 2:12 essential 136:15 estate 9:6 20:8 30:12 ESTELA 2:12 ESTRADA 2:12 EULALIO 2:11 evasive 45:11 EVELYN 1:5 evening 143:13 event 64:3 81:13 121:3 132:10 events 32:7,9 35:23 36:1 91:22 92:2 100:21 146:4 everybody 59:2 112:19 136:8 everyone 51:2 99:13 123:17 154:16 everything 150:17 161:1 everywhere 136:13 evidence 148:18 exact 12:17 22:16 23:4 43:15 60:2 89:21 107:17,19 147:4 exactly 30:20 36:25 37:20 38:12,14 45:17 67:2 69:18 74:18 88:7 101:4 118:13 140:4 148:21 151:2 examination 5:6,7,8 7:6 126:4 165:11	examined 14:7 16:23 17:1 116:12 119:23 example 41:21 47:2 61:12 63:9 84:19 91:24 140:18 150:10 examples 41:22 79:3 118:19,21 exceeds 60:11 except 164:3 exchange 94:23 160:22 exclusively 60:4 87:4 91:19 excuse 126:21,25 executed 164:16 execution 31:4 112:23 executive 6:16 16:3 26:18 28:17,21,24 33:22 35:5 36:1 42:15,16,20 43:8,10,19,22 44:5,17,19 45:5,16 46:8,9,11,18,20 47:10 49:6 58:9 62:3 63:24 64:15 104:23 116:18,21 124:8,23,25 153:4 exercise 144:3 exercised 149:21 exercising 135:14 exhibit 6:1,3,5,7,9,11,13,15 ,17,19 13:21,24 14:7 16:23 17:2 19:6,9 94:10,13 99:1,4 105:19,22 113:17,20 116:7,10,12 119:15,18,23 122:4,7 146:19 147:15,17,23 exist 70:7 existed 55:10 exists 125:22 expand 109:2
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

expect 161:14	favor 15:8 129:7	fliers 76:18 121:19
expectations 153:25	fax 4:25 165:24	Floor 4:4
expend 60:23 89:18	faxes 114:15 145:7	FLOYD 1:3
153:19 154:3	Federal 3:11 7:15	flyer 6:18
expended 60:14 86:1	fee 26:11,12	focus 126:21 127:1,3
91:11,17 108:13	feed 102:21	folks 104:9 118:19
expenditure 91:21	feel 20:1 35:16 39:16	follow-up 159:8
expenditures 31:5,6	68:5,8 84:21 133:13	force 153:16
expense 132:20,23	feeling 9:17	forces 153:12 156:17
142:19,20	felons 76:7	foregoing 164:1,16
explain 155:3	felt 46:7 92:25	165:8,12
express 58:8	field 30:3,5,6 127:9	Foreign 115:21
expressed 124:8 159:4	Fifth 117:17	foreseeable 161:16
164:17	filed 12:6 19:20	form 37:12 44:2 45:23
expression 155:7	42:25 48:17 77:15	127:24 128:25 133:19
extensive 77:7,12	filings 42:23 43:25	135:25 136:24 137:24
extent 28:20 29:16	48:22	forms 37:14,24
51:20 58:21 92:12	fill 25:25 72:2 74:11	38:21,22 84:4 123:7
110:1	103:4,6,8 132:16,17	128:20 137:9 138:14
extreme 153:10	filled 123:6,8 133:3	140:11 152:19
Ezra 130:5	filled-out 123:10	formulated 66:13
<hr/>		
F		
face 69:8,9,21	filling 72:6	forth 51:19 165:9
faces 70:1	filters 160:18	forum 87:13
fact 32:12 35:16	final 35:19,20 125:24	forward 64:22 91:5
75:22 140:5,9	finance 30:4,24 56:11	forwarded 14:9 34:15
144:14,25 146:13	financial 31:2 75:13	58:20
factors 136:4,7 145:3	78:16 109:7 137:3,8	fostering 158:24
factual 20:2	154:4	fought 133:17
factually 23:9	fine 22:2 48:3 51:5	Francisco 136:12
fairly 53:7	122:10 123:22 150:18	fraud 124:9,15 158:24
fall 75:1 121:24	finish 10:25 11:6	free 114:24 117:25
146:8	15:4 17:11	118:6 132:2
falling 130:2	Firm 4:23 165:22	front 16:19
familiar 16:5 90:7	first 7:4 9:16 18:15	fulfill 92:8 134:19
96:11 120:1 138:8	24:1 30:15 34:24	161:15
family 68:19 76:10	77:4 81:16 100:24	fulfilling 30:10
fast-pacing 66:11	104:16,20 114:23	full 7:21
	116:18 117:22 131:14	full-spectrum 52:22
	135:19,20	

full-time 30:19 51:16,17	134:12,23 141:10 142:19	halls 115:23
fully 17:9	Gillian 94:24 95:9	HAMILTON 1:3
function 32:2	given 57:7 74:22 79:3 142:15 145:12 161:23 164:18	hand 76:9 77:20 103:4 120:17 164:18
functioning 31:9	giving 72:3	handed 57:6 76:23 103:22 120:21,24
functions 89:2	gladly 11:13	handgun 37:18
fund 1:15 78:22 93:7	goals 36:11,14	handing 13:23 19:8 94:12 99:3 105:21 113:19 116:9 119:17 122:6
funding 32:14	God 88:16 154:23	handle 60:9 161:7
fundraising 31:4 32:13	gone 79:8 137:6 156:22	handled 66:12
funds 61:19,20 62:8,15,20 63:2,10,25 64:17 75:2,3,6,7,9,12 78:16,19 93:3,6,9,10,11,13,17 ,22 109:2 161:10	GORDON 1:5	handling 58:20
future 161:16	Gosh 20:25	handouts 76:17 121:19
<hr/>		
G		
GANDY 1:6	gotcha 134:8	happen 68:4
GARCIA 2:12	gotten 123:12 156:22	happened 45:4 101:11,12 127:6 143:23 148:22,24,25 149:4,5 150:4,16,24
Gary 12:13 27:18 29:8 54:15 103:24	governing 28:10 35:8	happens 157:13
gather 52:5 90:4	Governor 1:10	hard 133:17
gathering 87:13	Grand 25:18 26:5	harder 71:11
general 4:9 7:11 79:24	great 8:17 37:6 81:5	hardest 63:19
generally 30:9 33:9 65:15 83:25 141:15	greater 142:12	hard-fought 39:16
generated 26:17	ground 9:13 32:3	hardship 109:7 142:12
geographical 27:16 102:3	group 50:24 76:20 99:21 106:3,12 152:12,24	harm 158:3,5
germane 58:18	groups 57:22,25 58:1 122:3 158:4	harmed 150:8
getting 48:2 68:23,25 69:9,16,24 70:2 72:1 83:11 88:18 91:5,16 102:22 112:1 117:25 118:6,15 127:16 128:7,9,16 131:10,13,22,24 132:4,5,13,21	grow 32:2	haven't 85:24 127:3
	guarantee 67:5	having 7:4 37:10 53:24 69:1 89:9 95:23 98:3,15,19 129:7,19 131:15
	guaranteed 135:15	head 10:21,22 83:7 93:12
	guess 40:4 60:18 69:4 81:4 88:17 93:8 141:10	heading 114:17
	guidance 55:7	health 53:20,21 65:1 114:24 115:5
	guidelines 121:25	heard 53:24 58:1 68:6 69:5,10 142:25
	guys 123:20	
<hr/>		
H		
	hall 115:19 116:1	

<p>155:7,8 156:13 159:5</p> <p>held 12:25 22:12,13 23:15 34:4,22 48:16,23 70:23 81:15 82:1,4,9,14 83:12,15 85:9,11 86:4,7,15 87:19 96:17 116:21 140:18 141:11,15</p> <p>help 19:23 89:14 103:1 114:19 115:1</p> <p>helping 90:4 134:16</p> <p>hereby 164:2 165:7</p> <p>herein 165:9</p> <p>hereto 3:13</p> <p>HERMAN 1:5</p> <p>he's 79:8,9,13 96:21 104:16,23</p> <p>hesitant 46:24</p> <p>hesitating 45:3</p> <p>Hey 8:12</p> <p>Hi 8:14</p> <p>HIDALGO 1:18</p> <p>hierarchy 34:21</p> <p>high 34:8</p> <p>highly 105:9 130:24</p> <p>hire 79:15</p> <p>Hispanic 1:17 49:19</p> <p>historical 61:12</p> <p>history 80:9 133:22 143:20</p> <p>Hmmmm 119:24</p> <p>hold 14:14 24:20 53:5,13 68:17 81:2 84:22 87:12,18</p> <p>honest 14:9 33:13 44:11 61:9 97:25 133:1</p> <p>honestly 63:17 87:1</p> <p>hopefully 95:10</p>	<p>hotline 73:14</p> <p>hour 13:10,11 125:12</p> <p>hours 30:16,17 77:24 108:16 131:14 136:22 139:10 153:20,22 154:10</p> <p>HOUSE 2:3</p> <p>Housing 56:14</p> <p>Howard 54:18,19</p> <p>human 147:1</p> <hr/> <p style="text-align: center;">I</p> <p>I'd 92:10 155:7</p> <p>ID 37:12,15,25 38:11,21,22 54:12 56:24 71:13 72:7 74:13 78:7 79:19 84:4 86:5 95:11 96:8,21 98:3,16,19 100:4 104:9 115:17,25 116:3 117:16,25 118:6 127:24 128:20,25 129:6 135:5,25 137:24 138:14 140:11 146:1,9 148:3 149:6 150:1 157:6 158:11,15 159:14,21,23 160:5,9 161:11</p> <p>idea 42:22 49:18 88:4 96:19 98:13 104:8 105:1,2 113:10,16 115:7,10,13,18 118:23 142:22</p> <p>identically 72:7</p> <p>identification 6:20 13:22 19:7 38:4,7,16,19 40:2,6 85:2 91:5 94:11 99:2 105:20 107:4 113:18 116:8 119:16 122:5 128:16 136:25 137:11 144:6 148:13 152:3,7,17,20</p>	<p>identifications 74:20</p> <p>identified 98:3,15,19 122:7 129:20</p> <p>identify 52:6 127:22 129:16 130:16</p> <p>identities 46:19</p> <p>identity 17:18 115:17 129:12 130:13,23</p> <p>IDs 115:1,12</p> <p>I'll 21:15 22:1 33:13 37:4 50:4 56:3 82:22 107:21 122:10 147:17</p> <p>illegal 88:14</p> <p>illness 9:22</p> <p>illustrated 100:1</p> <p>I'm 7:10,12 9:11,13 10:14 12:16 13:23 14:8,12 16:24 17:3 18:8 19:8 20:13,16 21:1 22:4 23:3,7 24:24 33:13 37:22 38:6,8 41:24 42:8,24 43:3 44:10 45:3,8,10 46:23,24,25 47:18,25 48:2 49:1,5,8,10 51:5,8 52:14 53:18 54:3 56:2,18 59:14 64:13,20 65:7,8 66:8 67:21 69:3,4,23 70:9,16 72:18 78:18 80:6 82:16,20 83:4,10,14 85:14 87:2,21 88:7,13,15,17 89:21 90:6,7,9,20 91:17 94:1,12 95:3,15 96:5 97:21 99:3 101:13,18,20,22,24 102:20 103:5 104:19 105:10,13,21 107:16,20 108:11,22 109:20,23 111:4 112:6,11,17 113:19 116:9 119:14,24 120:1 122:6 123:22</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>128:21 133:24 134:11 140:4,8 141:10 147:14,20 150:17 151:7,11 152:5 153:2 156:1 157:6 160:24 161:5</p> <p>IMANI 1:15</p> <p>immediately 125:23</p> <p>impact 39:23,25 40:1 46:5 52:8 70:18 80:25 81:7 83:23 85:16 87:5 89:15 127:7 157:23</p> <p>impacted 93:21 129:5,8 143:22</p> <p>impacting 51:25 52:10 55:2 137:1</p> <p>impediments 152:14</p> <p>impersonation 124:10,15</p> <p>implement 55:9 81:10</p> <p>implementation 90:15 130:14,17</p> <p>importance 87:5</p> <p>important 31:24 93:1 102:5 143:2</p> <p>impose 140:6</p> <p>imposed 148:11</p> <p>imposes 138:21</p> <p>impossible 153:8,9</p> <p>INC 2:13</p> <p>inception 73:22 79:25 88:25</p> <p>incident 101:3</p> <p>include 26:18 69:14 90:3 106:16</p> <p>included 93:3 99:18 100:11 112:5 145:23</p> <p>includes 10:9 33:5 71:8 78:12</p>	<p>including 31:1 42:7</p> <p>income 68:14 114:24</p> <p>incorrect 82:16</p> <p>increased 33:11 91:20</p> <p>incurred 142:19,20</p> <p>indeed 87:19</p> <p>INDEX 5:1 6:1</p> <p>Indiana 159:24</p> <p>indicate 17:16 158:8</p> <p>indicated 100:25 146:19 148:3</p> <p>indicates 100:24</p> <p>individual 41:9 54:2 117:7</p> <p>individuals 34:8 44:22 45:6 47:7 57:17 109:10,14 120:12 136:10 155:16</p> <p>industry 20:9</p> <p>information 13:16 26:20 32:23 34:3,13,22 55:8 57:19 58:19 59:5 72:3 73:12 75:20 77:22 80:24 84:13 92:2,5 102:4,22 103:7 111:11,14,19,25 112:4,18,21 118:7 130:16,24 139:2 145:6 149:17 160:9,18 161:4</p> <p>informational 91:22 120:11</p> <p>informed 153:24</p> <p>inherent 69:8</p> <p>initiate 42:3</p> <p>initiated 78:8</p> <p>initiation 42:21 43:6,18 49:17 50:19,25</p>	<p>initiative 71:7</p> <p>initiatives 52:21</p> <p>injunctive 6:6 19:19</p> <p>injured 129:13 130:14,17</p> <p>injury 129:21</p> <p>input 45:19,23 47:6 62:7 100:8,10</p> <p>inroads 127:18</p> <p>insight 13:17</p> <p>instance 3:4 43:13 46:21,22 151:10</p> <p>instances 142:9 150:9</p> <p>instead 138:24</p> <p>instruct 47:20</p> <p>instructing 74:11</p> <p>instructs 11:19</p> <p>instrument 164:16</p> <p>insurmountable 128:10</p> <p>Integrity 4:22 165:22</p> <p>intend 22:5</p> <p>intended 158:3</p> <p>intent 14:24 60:5,7 157:12,16,17,21,25</p> <p>Intention 6:4 14:18</p> <p>interact 29:8,11</p> <p>interacted 95:23</p> <p>interacts 95:22</p> <p>interest 40:13 63:12</p> <p>interested 68:3 165:15</p> <p>interject 129:10</p> <p>interjecting 131:2</p> <p>intermediary 34:21 35:15</p> <p>internet 112:20 145:4</p> <p>interruption 8:11</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>52:13</p> <p>intervention 82:21</p> <p>introduction 8:23</p> <p>invited 45:6</p> <p>involve 32:21 55:5 76:16 107:20</p> <p>involved 30:22,23 32:5,18 47:16 48:9 49:1,3,9,11 64:12 70:10 77:14,17 86:22 94:8 96:1,15 112:1 114:17 133:7 157:3</p> <p>involvement 20:14 51:10 53:9 59:8</p> <p>involves 26:10 73:8 148:23</p> <p>involving 82:25</p> <p>irregularities 80:24</p> <p>irrespective 154:21</p> <p>isn't 143:15</p> <p>issue 59:4 63:9,15,23,25 65:5,12 84:25 100:11 142:13 146:14,24</p> <p>issues 58:9 65:1,4,17 73:9 78:11 86:11</p> <p>it's 22:16 27:2 32:8 33:11 34:18 36:22 37:1 40:24 41:25 45:10,11 53:1 55:14 60:24 64:25 73:7 74:3,10 75:12 78:8 85:5 88:16 89:25 90:12,13 92:13 95:17 103:12 109:7 111:15,21 117:6,7 118:13 120:11,14,15 122:20 125:11 129:18 130:20 132:1 134:1,18 135:6,12 137:1,6 140:1 141:7 143:24 144:25 146:3,23 147:7,15 148:11 160:13</p>	<p>I've 23:12,15 25:10,13 49:21 56:4 57:25 58:1 64:6 93:9 123:12 142:24 143:20 156:12,15 157:4 158:25 159:8</p> <hr/> <p style="text-align: center;">J</p> <p>JANE 1:3</p> <p>January 6:16 8:2 82:24 106:5 112:15</p> <p>Jefferson 54:16,18,19 59:20,21</p> <p>job 30:11,19 54:24 157:8</p> <p>JOHN 1:5,10,21 2:6,16</p> <p>join 39:22 41:10 42:3 43:2 44:13 45:21 89:13</p> <p>joined 26:5</p> <p>joining 10:16 40:19 41:4 42:10,13 47:10 48:7</p> <p>JR 2:11</p> <p>judge 147:8 148:12 150:19 151:14,16,18</p> <p>judges 1:17 151:19,20</p> <p>June 2:24 3:6 7:18 162:19 163:2 165:16</p> <p>justice 4:16 40:9 47:2,4 51:23 52:18 56:7 121:12</p> <hr/> <p style="text-align: center;">K</p> <p>Karen 3:7 4:21 165:5,21</p> <p>KEN 1:6</p> <p>Killeen 119:14</p> <p>kinds 47:6 87:8 88:2 89:17,18,24 93:2 94:4 155:1</p> <p>Knatsen 105:7</p>	<p>knew 156:2</p> <p>knowledge 17:6 18:25 41:12 50:21 51:1 57:1,24 58:3 67:15 70:24 96:20,25 97:12 98:15 105:4,8 120:6 124:7,16,19 128:22,23 135:19,22 159:3</p> <p>known 143:21 164:14</p> <p>KOBY 1:4</p> <hr/> <p style="text-align: center;">L</p> <p>LA 2:13</p> <p>lack 78:21</p> <p>lacked 153:23</p> <p>ladder 34:16</p> <p>Lane 4:23 165:23</p> <p>lanes 61:17</p> <p>language 152:12,24</p> <p>LARA 2:12,13</p> <p>large 60:9 115:15</p> <p>last 29:5,7 30:21 39:5,6 50:12 53:11 81:5,21 86:25 105:5 106:13 112:25 116:18,20 123:16 133:8 144:4</p> <p>later 8:18 74:24 104:11</p> <p>LATIN 1:6</p> <p>law 3:9 71:12,17 72:18 76:25 77:13 135:19,20 149:11 151:1,9,13 155:4 159:23 160:3</p> <p>laws 76:5 77:6 79:24 80:20 85:22 86:5 146:10 148:19,23 154:21,24 155:2 159:21 160:5</p> <p>lawsuit 36:18,21</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

39:22 40:8,13,20 41:5,11 42:3,10,13,21 43:2,6,18 44:13 45:21 47:11 48:7,22,24 49:17 50:20,25 78:13 Lead 1:9 leadership 47:6 leading 48:21 49:16 50:19,24 League 1:6,14 50:18 57:23 leaning 92:16 learning 78:4 least 53:11 led 65:14,16,20 legal 4:22 40:17 41:13,17 165:22 legibly 75:17 legislation 46:5 54:11,12,14 55:19 56:25 69:3 85:14 87:4 126:10 159:15,18 160:9,20,25 161:11 legislative 2:3 27:12,15 46:2 49:10,16 50:1,7,10 51:17,18 53:6,13 54:5,9 55:6,15 60:11,15 65:19,23 67:18 69:25 76:25 77:2,16 79:10 85:15 93:24 159:15 160:16,17 legislative-related 59:25 legislators 54:2 57:8,11,18 66:5 83:21 157:25 legislature 51:11 53:23 58:4 60:5	66:2,25 67:8,14,18,22 69:11,24 70:15 80:23 157:20 158:3 leisure 68:20 LENARD 2:11 lend 136:5 lengthy 78:2,3 less 79:4 90:22 91:11 135:24 137:23 139:10,16,19,20 141:19 142:14 144:20 Let's 30:14 56:12 62:12 Letter 32:22 letters 45:24 level 16:3 32:1,6 34:20 35:14 44:1 46:8 47:3 49:7 55:14 62:8 87:20 107:13 145:1 liaison 27:15 49:10 libraries 141:13 library 132:8 license 37:19,20 38:23 90:12 91:2 100:16 101:1,4,6 104:11 133:9 146:16,20 147:22 148:4 149:2,7,14,20 150:15,22 life 26:5,6,7,8 likely 135:24 137:23 144:20 146:8 limit 140:7 limited 153:13 Linda 2:23 3:3 5:5 7:3,17,22 16:2 42:5 51:6 163:2 164:1,7,13 165:8 Lindsey 130:6	 line 96:24 119:2 lingering 112:8 LIONEL 2:11 list 15:18 18:13 99:13,18 100:12 113:13 147:24 listed 38:22 106:3 listened 68:9 literacy 145:1 litigating 47:16 48:9 litigation 77:15 78:13 82:25 83:2 88:3 94:7,20 99:8 105:24 113:24 116:11 119:20 122:17 126:20 127:5,6 little 51:13 100:20 101:15 133:24 live 27:17 70:14,17,23 102:21 109:6 lived 25:13,14,15 136:11 lives 27:16 29:20 141:9 LLP 3:10 4:3 Lobby 51:15 52:1,3,4,25 53:5,16,17,19 57:5,14 59:24 lobbying 77:17 local 33:17,20 34:20 35:8 36:7 40:25 41:6 87:15,20 114:18 115:15 119:8,11 141:13 locate 147:14 located 109:6 136:22 locating 115:24 location 101:14 141:7 142:13,20 149:1
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

154:4	161:14 163:2	matches 72:6 74:14
locations 25:13 73:13 81:19 84:14 112:9,18 148:25 154:10	164:1,7,13 165:8	material 74:9 75:14 91:21 112:23 160:22
Locke 3:10 7:19	<hr/> <hr/> M <hr/>	materials 90:11 121:9
long 12:18 22:12 23:1 25:7 55:10 68:12 73:20 79:22 88:23 102:13,18 120:14 133:21	ma'am 162:12	matter 7:13 16:5 48:1
longer 76:11 79:13	machine 3:9 150:14,22	matters 15:13,21 16:12,16 17:7,12,16 30:24 31:2 86:20
LONGORIA 1:18	mail 114:14	MAXIMINA 2:13
Lord 3:10 7:19	mailers 87:24	may 8:9 11:4 13:17 16:4 22:3 30:23 31:8 46:16 53:20 68:17 72:8 74:23 86:23 90:6 97:6 99:15 112:9,10 130:14,17,21 149:3 161:20 162:13,15
Los 4:4 25:21	main 53:3 126:21 127:1,2	maybe 12:19 13:10,11 53:10 59:18 60:21 67:24 92:11 107:17 109:17 129:9 133:24 136:14
losing 68:14	maintain 130:15	McCRAW 1:22 2:7,17
lost 79:16	majority 44:7 66:9 82:7 86:24	mean 21:16 35:1 36:24 37:8,18 53:23 61:10 66:18 69:22 84:16 88:8,13,20 91:4 102:24 104:23 118:1 120:11,13 148:9 149:14 150:18 155:14,23 156:14,20 161:1
lot 14:9 27:11 56:4 60:1,10 71:11 72:9 120:2 141:2 142:18 143:15 145:9 146:23 155:10 157:3	MALC 50:4 57:22	meant 82:1
lots 56:18 80:6	man 155:20	measure 100:5
low 114:24	manage 27:6,7 28:5	measures 51:25 55:7 66:19,20
lower 136:9	management 27:12	medications 10:1
Lufkin 6:16 29:7 116:19	mandate 152:10	meet 12:11 28:25 29:2,5 54:2
LULAC 1:7	mandated 152:8	meeting 29:7 42:9 44:12,17,23,24 45:2 47:9 48:7,14 49:4 50:6,8 86:14
lunacy 133:20	man-hours 108:14	
lunch 125:12,18	manner 63:3 90:18	
Lydia 2:12,23 3:3 5:5 7:3,18,20,22,23 8:1 9:3,16 11:22 12:3 13:23 14:5,16 15:8 16:9 19:8 20:7 28:16 36:17 39:3,8,14,21 40:7,19 42:2 51:9 62:14 94:12,15 99:3,6 104:16,18 105:21 113:25 116:13 119:21 122:15 124:6 126:6 131:6 133:12 134:2 135:18 157:10	manpower 92:14	
	MARC 1:3	
	MARGARITO 2:12	
	MARIA 1:18	
	Marion 160:1	
	marked 13:22,24 19:7,9 65:22 94:11,13 99:2,4	
	105:20,22 113:18,20 116:8,10 117:7 119:16,18 122:5	
	marketing 8:7 9:5	
	MARTINEZ 2:12,13	
	mass 87:23 136:15	
	masses 146:6	
	mastered 145:10	
	match 74:18 101:4,6,8 149:6,8 150:1 152:20	

<p>116:17,18,21</p> <p>meetings 12:25 26:25 27:2,4 28:21 35:24 42:12 48:23,25 49:15 50:18,23 53:13,15,18,20,25 70:22 116:24 125:2,5</p> <p>MELLOR-CRUMLEY 1:5</p> <p>member 24:2,5,11,13 25:2,8,10,16,18,20 26:6 41:14 87:3 129:12,16,20 130:13,16</p> <p>members 17:18 26:17 31:18,20,21 32:6 33:1,4 40:23,25 41:6,9,17 44:5 46:20 55:17 56:24 58:7,22 76:4,10 77:3,5,11 79:23 80:2,3,12,19 82:1,15 83:17 84:3,11 85:12,22 88:10 120:10 124:13 127:23 128:18,24 153:4,5 156:5 159:4</p> <p>member's 130:22</p> <p>membership 24:3,18,22 26:1,2,3,4,7,8,9 30:3 31:23 32:8 33:8,15,17 34:3,14,18,19 35:21 44:25 45:12,13,20,25 46:25 63:13,14 87:17,23 89:6 91:25 92:1 145:22 152:11,24</p> <p>memberships 24:7,9,21,22 26:5 33:22 34:15</p> <p>memory 106:10</p> <p>MENDEZ 2:11</p> <p>mention 13:19 18:18 80:1 126:17</p> <p>mentioned 20:8 32:13 35:23,24 51:10 52:1</p>	<p>55:25 61:21 62:20 65:5,10 69:25 77:10 78:17,18 79:19 110:16,19 116:23 120:21 126:18</p> <p>mentions 96:7,24 119:2</p> <p>merged 73:3,4</p> <p>Mersal 8:6</p> <p>message 69:10 127:16</p> <p>messages 97:11</p> <p>Mexican 2:2 49:15,25</p> <p>MICHAEL 1:4</p> <p>MICHELLE 1:15</p> <p>middle 34:9 104:7 114:16</p> <p>midwives 128:11</p> <p>military 38:11</p> <p>Miller 4:14 5:8 8:12,13,17,21 123:20,25 124:4 130:7,10 162:5</p> <p>mind 15:3 17:10 41:25 42:1 61:1 91:24 112:9</p> <p>minimal 133:7 134:12</p> <p>minimizing 158:5</p> <p>minorities 39:24 133:23 157:14,24</p> <p>minority 55:3 115:16 135:24 137:23 144:20 146:8 152:12,24 158:3 159:6</p> <p>minutes 6:16 12:19 26:24 44:11,12 48:13,16 116:17,24 117:1</p> <p>Miss 7:23 8:1 9:3,16 11:22 14:5,16 15:8 16:9 19:8 28:16 36:17 39:3,8,14,21 40:7,19 42:2 51:9</p>	<p>62:14</p> <p>missed 18:8,12</p> <p>mission 36:10,14 51:19,21 92:8,11 134:18,20 145:24 161:16</p> <p>missions 36:10</p> <p>Misstates 41:1</p> <p>misstating 78:18</p> <p>mistaken 66:8</p> <p>mobilization 71:9 73:10 81:9</p> <p>mobilized 69:16</p> <p>mobilizing 102:5</p> <p>moment 131:3</p> <p>moment's 125:4</p> <p>Monday 110:20 148:1</p> <p>monetary 132:12</p> <p>money 86:1</p> <p>monitor 159:21</p> <p>monitoring 51:24 55:6 161:10</p> <p>MONTEZ 1:4</p> <p>months 30:15</p> <p>morning 7:8,9 10:5 143:14</p> <p>move 25:24 64:22 91:4 141:6</p> <p>moved 25:24</p> <p>movement 57:17</p> <p>Moving 70:25</p> <p>Multitude 26:16</p> <p>myself 53:2 68:14 114:11 122:14 123:9</p> <hr/> <p style="text-align: center;">N</p> <p>NAA 79:1</p> <p>NAAC 159:13</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

NAACP 2:2 6:4 9:1 14:21 15:23 16:3,11 19:21 20:12,15,17 21:12,15,16,17 22:4,6,10,18 23:5,24 24:2,4,6,8,12,16 25:4,5,6,9,10,23 26:6,14 28:17 29:9,24 30:11,24 31:7,17,19 32:15 33:2 36:10,11,15 39:21 40:11,20 41:5,9,14,17 43:7,24 44:25 45:13 46:22 48:22 49:14 50:17,22 53:5,12 54:8,22 55:16,20 56:20,24 57:3,21 58:7,10,22 59:8,12,23 61:5,6 62:7,21 65:21 66:24 67:6,7,16 68:5 69:8 70:1,14 71:2,25 72:21 73:20,23 76:2,3 78:17 79:2,15,22 80:3,4,10,20 82:15 84:21 87:9 88:5,9,23 89:18,23 90:3,17 92:7,11 94:5 95:22 96:18 97:3,7,12 100:6 102:9 104:3,21 114:9 119:11 120:6,7,10 121:6,8 124:7,12,25 126:7,16 127:10,21 128:17,24 130:12 131:7,9,23 133:12 134:15 135:7,9,23 137:22 138:20 141:24 142:22 144:19 146:7 151:22 152:9 153:1,4,5,7,11 156:6,16 157:19 158:2,8,11,14,20 159:3,20 160:7,12,17,22,23 161:9,14 NAACP's 51:10 91:6 141:18 159:14	Nashville 25:15,16 national 22:6 24:10 25:4,6,8 29:24 33:25 34:16,17,23 35:14,18,19 36:10,11,15 43:23 55:11,12,14 62:7 64:2,10 73:15 86:23 97:5,10 114:6,9 121:25 160:14 161:2,3 nature 46:5 64:9 69:8 72:15 necessarily 25:12 69:2 80:11 86:9 140:8 necessary 84:22 90:4 133:13 156:22 necessitate 131:15 necessities 127:19 necessity 136:11 146:1 150:18 negatively 129:8 neighborhood 139:9 neighborhoods 136:22 139:24 neither 165:14 NGR 1:9,20 2:5,14 night 110:20 nobody 129:5 155:22 nod 10:21 nodded 83:7 93:12 nonmonetary 132:3,5,10 nonpartisan 120:15 nor 70:21 165:14 normal 65:23 66:2 normally 27:25 29:17 41:19 72:9 81:15 140:14	NOTARY 164:22 note 124:24 125:20 noted 164:3 notice 6:3 14:18,23 16:12,16 72:10 125:4 noticed 15:22 49:18 NW 4:16 NWB 4:17 <hr/> O oath 164:14 165:9 object 11:16 47:18 objecting 47:22,25 Objection 40:14,16 41:1 70:8 98:11 objectionable 120:14 objections 165:11 obstacle 135:12,14 obtain 34:17 41:10 108:8 123:4 137:24 obtained 43:24 113:11,13 115:12 123:3 126:12 obtaining 84:4 154:5 obviously 35:18 55:6 68:22 74:10 77:14 102:5 108:14,18 109:12 120:11 128:13 133:2 134:1 149:18 occasion 121:11 occasionally 121:11 occasions 121:20 126:19 occur 81:18 87:10 125:1,4 139:3 occurred 90:15 150:21 occurs 63:4 October 81:16,23 95:5 99:21 106:23 107:2 112:15
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

odds 129:6	70:6,13 71:1 73:8	operation 30:7 131:14 136:23
offer 41:17 54:8	74:1 75:12 76:15	operational 60:20 62:15 84:9
office 4:9 29:24 33:25 34:16,17,23 35:19 43:23 48:18 55:12 73:15 77:23 84:16 108:16,25 112:18 114:7,9 123:4 131:13,15 132:8 136:19 153:20 157:7,8 161:2,3 164:18	79:19 80:14 81:15,25 83:10 85:18 86:18 88:5,17 91:10 93:8,20,24 94:7,18 95:8 96:20 97:24 98:24 99:5,17,20,24 100:14 101:7,25 102:13,20 103:13,18 104:5 105:1,11,14 106:2,8,12 107:1,11 109:25 110:12 114:23 115:11 116:5,23 117:6,13,15 118:9,14,17,24 119:2 120:5,25 121:8,21 122:12,22 123:13,15,22,24 124:4,5,20 125:7 129:22 130:4,7,10 131:1 134:5,6,10 135:3 137:22 138:11 140:16 147:2,16 149:16 150:8,24 151:6,7,12 156:4 159:2,8,9,12,19 161:18	operations 86:23 opinion 66:22 opportunity 67:17,25 68:10 opposed 30:11 120:19 142:16 opposing 67:25 Oral 2:22 3:3 6:4 14:18 orchestrating 53:4 order 34:17 37:12 66:10 71:20 111:23,24 128:15 131:16,18 133:3 135:1 136:24 142:1 149:17 155:16
officer 20:16,18 76:12		organization 31:12,14 32:2 34:18 36:3 40:21,22 50:24 72:20 95:17,21 129:3
officers 26:19 46:12		organizations 121:18,22
offices 3:9 7:19 77:24 84:14 91:18 107:4 109:5 112:10 136:21		organizing 35:23,25 52:25
official 1:21,22 2:6,8,16,17 20:19 26:14 50:2 74:16 142:25 150:25		origin 35:21
officials 147:2		original 60:5,7
oftentimes 60:24		ORTIZ 1:4 2:11
Oh 18:8 88:20 95:17 121:7 122:12 124:2 138:10 159:12		OSCAR 1:4
okay 8:3,9,17 9:8,11,14,21 10:11,14,19 11:10,15,22 12:3,15 13:7,18 14:4,15,19,22,25 15:2,5,12,16,21 16:8 17:1,22 19:1,5,13,23 20:5 21:11,23,25 22:9,12 24:1 25:7 26:13 28:8,12 35:11 36:5,13 37:5,7 38:13 41:8 42:19 45:9,12 47:9,24 48:4,19 50:22 51:6 52:15 56:6 57:5 59:6 62:20 63:2 65:14,19 69:19	older 145:9,11 Olympics 23:11 ones 16:22 93:17 111:9 145:11 one-time 26:11,12 ongoing 78:12 127:14 onset 27:13 onto 15:19 open 39:18 77:24 141:16,25 154:10,12 operate 40:5 73:14 145:5,9 operates 16:3 operating 40:3 61:19,20 75:2,9,12 93:3,7,9,11,17 108:17 161:9	others 17:13 37:21,23 41:24 55:3 56:18 128:13 147:3 otherwise 72:7 132:12 outcome 69:3 107:19 110:5,7 143:22 165:15 outraged 133:24 outreach 78:25
odds 129:6	70:6,13 71:1 73:8	operation 30:7 131:14 136:23
offer 41:17 54:8	74:1 75:12 76:15	operational 60:20 62:15 84:9
office 4:9 29:24 33:25 34:16,17,23 35:19 43:23 48:18 55:12 73:15 77:23 84:16 108:16,25 112:18 114:7,9 123:4 131:13,15 132:8 136:19 153:20 157:7,8 161:2,3 164:18	79:19 80:14 81:15,25 83:10 85:18 86:18 88:5,17 91:10 93:8,20,24 94:7,18 95:8 96:20 97:24 98:24 99:5,17,20,24 100:14 101:7,25 102:13,20 103:13,18 104:5 105:1,11,14 106:2,8,12 107:1,11 109:25 110:12 114:23 115:11 116:5,23 117:6,13,15 118:9,14,17,24 119:2 120:5,25 121:8,21 122:12,22 123:13,15,22,24 124:4,5,20 125:7 129:22 130:4,7,10 131:1 134:5,6,10 135:3 137:22 138:11 140:16 147:2,16 149:16 150:8,24 151:6,7,12 156:4 159:2,8,9,12,19 161:18	operations 86:23 opinion 66:22 opportunity 67:17,25 68:10 opposed 30:11 120:19 142:16 opposing 67:25 Oral 2:22 3:3 6:4 14:18 orchestrating 53:4 order 34:17 37:12 66:10 71:20 111:23,24 128:15 131:16,18 133:3 135:1 136:24 142:1 149:17 155:16
officer 20:16,18 76:12		organization 31:12,14 32:2 34:18 36:3 40:21,22 50:24 72:20 95:17,21 129:3
officers 26:19 46:12		organizations 121:18,22
offices 3:9 7:19 77:24 84:14 91:18 107:4 109:5 112:10 136:21		organizing 35:23,25 52:25
official 1:21,22 2:6,8,16,17 20:19 26:14 50:2 74:16 142:25 150:25		origin 35:21
officials 147:2		original 60:5,7
oftentimes 60:24		ORTIZ 1:4 2:11
Oh 18:8 88:20 95:17 121:7 122:12 124:2 138:10 159:12		OSCAR 1:4
okay 8:3,9,17 9:8,11,14,21 10:11,14,19 11:10,15,22 12:3,15 13:7,18 14:4,15,19,22,25 15:2,5,12,16,21 16:8 17:1,22 19:1,5,13,23 20:5 21:11,23,25 22:9,12 24:1 25:7 26:13 28:8,12 35:11 36:5,13 37:5,7 38:13 41:8 42:19 45:9,12 47:9,24 48:4,19 50:22 51:6 52:15 56:6 57:5 59:6 62:20 63:2 65:14,19 69:19	older 145:9,11 Olympics 23:11 ones 16:22 93:17 111:9 145:11 one-time 26:11,12 ongoing 78:12 127:14 onset 27:13 onto 15:19 open 39:18 77:24 141:16,25 154:10,12 operate 40:5 73:14 145:5,9 operates 16:3 operating 40:3 61:19,20 75:2,9,12 93:3,7,9,11,17 108:17 161:9	others 17:13 37:21,23 41:24 55:3 56:18 128:13 147:3 otherwise 72:7 132:12 outcome 69:3 107:19 110:5,7 143:22 165:15 outraged 133:24 outreach 78:25

outset 16:18	part-time 8:7	142:9
outside 45:15 53:17 57:14 66:22 67:12 87:10 93:24,25 94:1,2,3 125:5	party 12:20 40:8 48:24 120:15 165:14	percentage 64:17
Overall 13:7 23:22	pass 161:4 162:3	perfectly 14:8 48:3
overlooking 23:8	passage 52:7 66:4,15 67:5	perform 89:1
oversee 30:7	passed 36:24 46:6 82:17	performance 28:2
OZIAS 1:5	passport 37:17,22 38:24	perhaps 49:9 54:15 57:17 64:13 68:1,21 83:21 110:15 128:11 129:7 156:12,22
P	past 31:21 76:2 92:19	period 42:25 78:3
p.m 3:7 110:21 162:19	paste 111:22	permissible 67:1,2,3
page 5:2 6:2 15:9,12,19 95:8 98:1 100:14,24 105:5 106:20,22 112:25 114:16 117:7,8,13,15 147:16,21,23	pasted 111:20	PERRY 1:10
PAGE-LINE 163:3	pay 60:3	person 12:24 27:8 28:5 49:9 74:19 79:7 110:15 141:8 144:5 146:18 158:21,22 164:15
pages 15:17	paying 103:15	personal 37:25 57:1 92:16 128:22,23
paid 12:24 21:6 27:7	PEGGY 1:5	personally 90:7 156:25 159:5 164:12
paper 76:8,11 135:6	pending 46:3,6 52:7 69:3 85:14,16	persons 115:17 116:2
paragraph 17:21 100:15,18,22 104:5,7 106:23 111:12 147:17,21	Pennsylvania 4:16	person's 148:12
paragraphs 15:18,19	PENNY 1:4	phases 89:4
parcel 158:1	people 30:3 39:18 45:15 46:4 51:24 61:1 67:24 68:3,15,23 69:16 70:2 71:14,20 73:11 74:11 75:16,20 76:10,24 77:20 78:5 80:4,6 83:24 87:7 88:18 89:14 91:16 97:11,16,17 100:8 102:6,23 103:1,4,7 108:14 109:18 112:16 113:13 115:24 127:17,20 128:10 129:3 134:16 135:14 140:23 141:3 143:9 144:25 145:7,10 146:2,24 150:11 154:3,25 155:25 156:17,21,24 157:4,7	phone 10:17 12:23 29:19 32:23 45:24 52:13 96:25 97:4,8
parole 76:12	perceived 127:7	phonetic 105:7
Parrillo 94:24 95:9,24 96:4 98:9	percent 79:9,10,12	photo 37:14 115:25 116:2 158:15
participate 31:11,13		photograph 37:25
participated 44:4		Phyllis 100:24 146:14,17,18,19 147:12 148:3,22 150:4 151:17
participating 69:24		Phyllis's 148:16
participation 59:8		picture 158:17
particular 14:13 41:20 81:6 92:14 108:24 129:11,12,20 130:13,16,22 150:19 161:7		pictured 37:12 72:7 74:13
		piece 31:24 40:2,6

<p>76:8 102:5 135:6 145:25</p> <p>pieces 75:25</p> <p>places 88:19 137:10 139:23 140:14,15 141:15 142:1</p> <p>PLAINTIFF 4:13</p> <p>Plaintiff-Intervenors 1:16,19</p> <p>Plaintiffs 1:8,13 2:4,14 4:2</p> <p>plan 95:11 110:19</p> <p>planning 27:1 50:6 96:8</p> <p>plans 124:17,20</p> <p>play 19:1</p> <p>players 53:3</p> <p>please 7:20,21 10:19,20,24 11:12 15:3,9 17:10 22:7 58:25 71:16 117:23 118:18 125:20,23 159:1</p> <p>plethora 77:25</p> <p>pockets 79:17</p> <p>point 16:22 17:20 30:18 72:15 112:10 115:14,19 117:22 118:18 130:23 147:20 148:14,21 149:10 150:25 151:3 154:17</p> <p>points 57:7 59:12,15,17</p> <p>political 52:9,11,20 54:16,21,25 55:2 56:6 59:19 65:1 106:17 111:3</p> <p>politically 158:9</p> <p>poll 133:18 135:8 154:25</p> <p>polling 139:14,22,23 140:15 141:21,25</p>	<p>142:7</p> <p>polls 55:16 56:23 88:20 89:14 154:11 158:7</p> <p>POPE 1:4</p> <p>popular 158:9</p> <p>population 145:2</p> <p>position 20:24 21:6 22:13 27:14 40:11 55:10 60:6,8 79:8 139:13 141:18 142:25</p> <p>positions 57:13</p> <p>positive 46:25</p> <p>possess 128:19</p> <p>possession 125:22</p> <p>possibility 42:10 112:8</p> <p>possible 105:9</p> <p>possibly 74:22</p> <p>post 132:8</p> <p>postage 132:14</p> <p>postcards 76:6</p> <p>pot 76:1</p> <p>power 74:15</p> <p>practice 105:3</p> <p>Prairie 25:19 26:6</p> <p>precinct 89:9 101:13,17,18,22 102:1,2,8,14,17,20 141:5,7 143:3,4 147:1</p> <p>precincts 139:25</p> <p>preclearance 82:25</p> <p>predate 42:23</p> <p>prefer 141:24</p> <p>preliminary 9:12</p> <p>preparation 12:12 13:1,4 19:24 30:17 95:24</p>	<p>prepare 12:4 13:19 70:23</p> <p>prepared 17:14,17 18:10,19 20:1 154:5</p> <p>preparing 13:8 127:5</p> <p>prerequisite 92:6 151:23 152:1 158:17</p> <p>present 44:17 68:11 130:21 136:5</p> <p>presented 70:18 113:23</p> <p>presenter 96:1</p> <p>presenters 96:2</p> <p>presently 129:11</p> <p>presents 135:13 138:13 152:13</p> <p>president 24:22 27:19 29:9 46:13 49:8 53:2 64:2,10 85:6 99:14 104:2,17,20 119:6,10 148:2</p> <p>presidents 68:16 99:12,17 106:15,16 111:5,8 145:8</p> <p>Press 56:15</p> <p>pressing 63:5 86:19</p> <p>pretty 23:14 52:12 54:3 62:1 119:14 125:10</p> <p>prevent 10:6</p> <p>previous 26:2 65:3 77:13 90:22 118:11 138:6 161:21</p> <p>previously 71:20 72:19 74:2 92:12 122:23 126:8</p> <p>primary 32:14</p> <p>printed 74:9 75:14 112:18,22</p> <p>Printing 91:21</p> <p>printouts 76:17 77:9</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

print-outs 121:19	programming 26:23 35:13 78:25	PUEBLO 2:13
prior 43:24 76:3 90:22	project 61:12 72:10	pull 74:13
privilege 47:19	promise 56:3	punitive 64:24
proactive 60:25	proof 144:14 146:22	purpose 80:21 82:5,6,14 85:21 97:20 140:19 144:1 157:11,12
probably 12:16 20:25 23:3,25 25:11 30:14,15,17 31:3 37:16 44:10 51:20 54:15 58:13 79:10 88:25 95:25 97:16 102:15 110:8 114:10,11 120:4 128:7 137:12 155:24 156:24	proper 108:19	purposes 27:5 61:11 62:17 72:21,24 82:22 83:9 86:7,9 89:24 97:15 129:14 164:16
probation 76:11	proposed 52:7 69:11 160:6	pursuant 3:11 112:13
problem 8:19 131:5 139:3 150:21	protection 6:18 71:9 120:1	purview 27:18 121:25
procedural 66:20	protest 156:12	<hr/>
procedure 3:12 86:23 128:5	prove 133:11 140:10 141:20	Q
procedures 65:23 66:2	proved 164:14	qualify 111:15
proceedings 70:21	provide 9:23 10:2 26:20 47:5 59:5 68:23 69:1 70:14 74:9 80:22 92:2,4 102:3 112:22 115:16 121:21 139:2 144:5,13	quarter 116:19 117:10
process 37:13 62:5 65:2,14,16,20,22 66:11 68:18,25 69:25 75:15 76:16 77:21 82:25 86:14 88:11 89:4 91:5 103:3 107:3 112:1,17 126:12 127:8,14 128:5,16 160:21	provided 54:4 77:20 112:10 118:22	quarterly 27:2 29:1 33:23 35:24 116:20 125:2,5
processed 133:4	provides 90:3 138:12	question 10:20,25 11:7,11,12,13,16,18 15:6 17:11 40:18 48:5 65:8 68:8,13 83:15 103:16 107:21 133:25 138:6 146:16 155:23 159:1,8
produced 3:4 88:3 94:19 99:7 105:24 113:23 116:11 119:19 122:16	providing 55:7 67:25 73:11 75:20	questioning 101:24 134:3,9
producing 15:24	proving 129:14	questions 9:12,24 10:3,7,15 16:15 18:24 155:15 161:18 162:3,4,5,8
product 8:8,10 9:4,6	provisional 74:23 104:10 113:14 138:8,12 140:2 141:20 142:1,15,23 143:1,6,17,21 144:1,16 147:6	quick 105:5 125:14
production 133:10	provisions 3:12	quite 44:11 61:9 87:1 109:3
programmatic 47:6 55:7,8 92:25	proximity 27:16 141:8	<hr/>
	public 1:23 2:8,18 46:21 139:11 141:13,16,25 164:22	race 152:11,23
	publicity 56:15	rather 131:21
	publicized 44:24	RDR 3:8 165:21
	publicly 48:19	re 19:19

reach 146:2,5 160:7	110:23 120:3 123:10	118:9,14,15 147:16
reached 115:6,8	recap 93:20	regard 57:3,20 69:15
reaching 98:2,18	receive 153:21	71:21 80:19 94:4,5
reactive 60:25	received 118:7	134:23 135:21 159:14
reading 49:22 98:5	receiving 153:22	160:5
104:12 107:6 114:23	recently 31:21	regarding 16:11 26:22
115:2 117:19	recess 62:11 125:18	54:5,13 55:18,19
ready 131:7	recipients 147:24	56:24 57:12 63:22,23
real 9:6 20:8 30:11	recognize 19:12,15	64:4 69:10 70:15,18
32:11 86:11 125:14	94:15 99:8 105:25	71:13 76:4 77:4,5,12
131:21	113:25 116:13	79:23,24 80:19,24
reality 60:19	119:21,25 122:17	82:2,15 83:17 84:11
realize 78:5	recommendations	85:22 97:11 98:15
realized 8:22	68:1,9,11	124:9 127:19 160:19
reallocations 126:19	record 3:13 7:21 8:16	161:6,23
really 33:14,16	16:2 20:6 28:15	regional 160:15
40:15,18 45:8 46:24	62:10,13 125:13,17	register 38:18 134:4
48:11 57:24 63:19	126:3 162:9 165:13	registered 4:22 103:1
70:20 71:11 90:9	recorded 97:10 165:11	127:23 128:18 134:17
95:15 96:5 97:22	recounting 148:15	156:6,9 158:22 165:5
98:22 107:16	recruiting 32:5,12	registering 84:3
108:3,11 109:3	145:21,22	157:5
111:9,10 120:1	recruitment 31:23	registrar 138:15
128:21 129:4 132:1	32:8 92:1,2	140:2 141:22
136:18 143:15 151:5	redirect 64:7	registration 4:23
153:10 154:1,9 156:1	re-enfranchisement	37:11 40:3,5
160:24	76:7 85:25 121:13	71:3,6,8,22
Realtime 4:21 165:6	refer 21:14 28:8	72:2,5,10,11,14,21
realtor 8:6	31:14 37:4 138:5	73:6,7 74:3,8,12
realtors 9:7	152:5	75:8,14,18 76:9,24
Realty 8:6	reference 118:24	77:21 86:10 92:3
reason 39:12 123:19	referenced 98:16	93:25 101:2,5,7
145:13 163:3	referencing 152:4,5	102:6,24,25 103:6,8
reasons 137:13,14	referrals 115:1,11	126:10 131:25
138:3	referred 21:21 51:22	132:5,7,13,18,21
recall 29:6 33:7	116:2 118:11 122:23	133:14 134:12,24
42:19,20 43:1,13,15	148:15	135:2,5 145:23
48:11 50:10 56:5	referring 22:4 27:10	146:22 148:6
63:15 67:12,13 70:22	28:9 67:21 75:3	149:3,18,20,24 151:4
82:8 83:15 85:8	96:21 98:9	152:18 155:17 157:4
95:23 96:1,13,15		165:22
107:18 108:1,6		registration/
		education 75:1
		regular 28:21 101:9
		140:20

regularly 29:8 89:10 95:22 121:8 141:4	51:19	129:15
reimbursement 31:5,6	represented 11:23 40:9	responsibilities 26:15 157:9
relate 122:25	representing 7:12 40:20,24 41:5	responsibility 39:17
related 71:3 91:7 97:20 104:18 126:8,15,20 127:11 165:14	request 115:23	responsible 31:4 55:1
relates 70:11	require 90:21 132:17 133:10 136:23	rest 24:10 61:18 137:5 145:2
relating 124:14	required 33:25 37:9,15 75:13 84:4 115:25 116:3 127:20 132:14 138:14,25 149:23	rests 24:19
relation 111:23	requirements 39:9 79:24 82:2 83:17 84:11 85:12 92:5 93:21 135:21 144:22 145:15,19 146:15 151:23 152:6 153:25 158:12,13,15	result 75:6 78:1 79:5,10 91:12 92:8 108:7 110:4 123:4 129:21 136:17 156:7
relaying 151:7	research 110:9	results 107:14 108:1 109:8
relief 6:6 19:19	reserve 162:7	retail 8:7,9
remedies 83:23	reside 7:23,24	retention 31:24 32:5
remember 63:20 81:21 97:23 104:8 107:18 108:4,24 109:15 154:24	residing 165:6	retract 107:21
remembering 63:20	resolution 139:2,18	return 121:21 139:14
repeat 11:13	resolved 83:2 138:24	reveal 42:5
repeating 83:14	resources 47:16 48:9 59:22 60:14,19,23 64:8,22 65:3,11,16 74:6,25 75:13 76:4,17 77:19 78:10,12,16 79:5 84:22,24 89:17 90:22 91:12,16 92:17,21 93:2 108:12,18	reverse 127:6
rephrase 11:13 36:6 41:3 48:4	121:15 126:17 133:13 134:16 137:4,8 139:7 153:14 154:4	review 13:4,8 58:21
replace 125:23	respect 159:17	Richardson 81:22 84:6,18 87:2
report 33:21	respective 133:5 151:20	RICK 1:10
reported 3:9	response 36:22 37:1,8 63:24 65:4 101:3	rides 88:20
reporter 4:20,21,22 10:16 162:10,13 165:6		rights 4:15 40:21,22,24 60:11 70:11 87:6 135:15
Reporter's 5:12 125:20 165:4		road 68:13
reporting 34:2 76:11		roads 62:18
reports 33:23 59:7,11		Robert 105:6,7,11,13
represent 14:16 40:13 82:23 94:18 99:6 105:23 113:22 117:1		role 33:7
representation 41:13,17		roles 23:22
representative 94:22		roll 101:6 149:7,9 150:2 152:21
representatives 2:4		Room 4:17

rough 125:21,23 roughly 23:21 32:25 Rudd 4:3 5:7 8:14,15,19,25 11:25 14:1,3 16:1 19:3 40:14,16 41:1 42:4 47:18,24 51:5 70:8 83:7 95:1 98:11 122:10 123:22 125:15 129:9,24 130:2,19 162:4,12,15 rule 66:20 rules 3:11 9:13 66:4,6 148:10 <hr/> <p style="text-align: center;">S</p> Safety 1:23 2:9,18 139:11 salary 60:3 San 136:12 Saturday 154:13,14 Saturdays 84:9 saw 121:2,4 SB 37:5,8,15 39:9 57:4 58:4 59:9 64:5,19 65:17,20,21 66:3,25 67:12,17 68:6 69:19 70:15,19 71:24 72:3,16 73:2 75:6,7,21 76:3 77:4,12 78:11,21 79:5 82:2,7,15 83:17 84:11 85:12 90:15,23 91:12 92:5,9 93:20,21 94:4,5 97:20 126:8,16 127:11,25 128:20 129:1 130:15,18 134:20 135:7,19 136:1 138:11,14,19 151:23 152:6,8,22 153:7,11,16 154:7 156:7,11,14,17 157:11,15,20 158:4,9 159:4,6,17	scan 100:16,25 101:1 146:20,21 147:22 148:4,5 149:15,21 150:15,22 scanning 146:16 149:1 scheduled 89:10 117:16 141:4 Schoeve 3:8 4:21 165:5,21 scholarships 92:18,21 school 34:9 schoolbook 65:12 schoolbook/textbook 65:5 schools 141:11 Scientific 23:11 scope 68:2 seal 164:18 sec 8:20 second 6:3 46:9 81:16 112:7 Seconded 14:17 secretary 1:10,22 2:7,17 20:22 21:8,11,12 22:10 23:17 26:13 28:2 30:10,22 33:8 46:13 49:24 111:21 112:2 116:23 section 4:15 15:13 114:21 seeing 123:10 140:8 seek 121:17 seeking 100:10 127:22 seen 14:6 18:16 120:4 121:1 segregated 144:8 seldom 143:7 seminars 96:9,11,17,21	Senate 36:22,23,24 37:1 129:13,21 send 32:9 57:16,18 80:23 97:10 112:4 132:15,16 145:7 162:13 sending 95:10 113:8,12 sense 39:17 63:7,8 sensed 97:21 sent 33:24 45:8 87:23 94:23 99:11,20,25 111:25 112:7 113:5 114:6,8,10 sentence 98:6 104:6 105:2,6 107:12 118:10 separate 36:13 46:14 72:23 separated 144:8 separately 144:10 September 17:19 SERGIO 1:3 served 23:9 serves 80:4 service 9:7 97:13 153:21 services 30:4,5,6 89:15 115:15 121:22 145:5 153:22 session 5:9 27:13 50:7,10,12 51:18 53:6,13 54:6,9 55:15 63:21 67:18 77:16 85:15 126:1 sessions 46:4 63:21 sets 18:20 85:3 shake 10:21 share 36:10 122:11 160:8 she's 16:4 119:6,10
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

shifted 27:14 63:10	soap 133:20 155:1,4,18,21 156:3	speak 11:4 22:5 57:12 67:25 71:12 76:1 83:22 142:2
short 69:4	social 133:9	speaking 68:3
shorthand 3:9	socioeconomic 136:4,7 138:3 145:3	special 66:13
Showed 101:7 118:11	solely 44:19	specially 27:3
sic 18:12 78:8	solicitation 32:9	specific 53:22 58:18 63:6 64:18 65:11 66:6 69:10 81:1 137:15 147:20 150:9
sign 133:9 147:5 162:11	solicited 34:15	specifically 11:18 53:25 54:2 57:3 62:16 64:21 66:13 71:21 80:18,20 83:16 109:23
signature 5:11 163:1 164:2	soliciting 32:18	speculate 43:4 49:12
similar 62:4 64:4 67:13 101:3 106:13 121:22	Solutions 4:22 165:22	speculation 21:1 98:12
simple 66:9	somebody 75:17 121:3 160:13	spend 30:10,14 61:2
simplicity 89:7	someone 49:6 53:21 72:1 79:15 85:1 109:18,20 131:15 133:3 134:3 135:13 144:3 145:18 149:21 156:13	spent 13:8 59:23 81:5
single 137:5	somewhere 22:16 143:23	sphere 161:3
sir 9:25 10:4,13 15:11,15,20 16:13 18:14,17 20:10 36:16,19 37:3 39:2 43:12,21 44:3,8,21 72:25 73:25 99:19 103:10 106:1,4,11 107:8 111:18 114:22 115:4,10 116:4,15 117:3 119:1 138:7	sorry 8:17 17:10 18:8 19:19 27:22 37:23 38:8 40:16 41:25 43:3 46:22 52:14 65:8 67:21 72:18 76:14 80:16 83:14 94:1 95:3 98:17 101:21 107:20 108:10 110:17 124:2 127:1 132:4 138:19 147:14 156:1	spoke 23:22
sit 61:1 68:15	sort 27:14 53:1 81:8 97:21 120:12 144:4 156:12	sponsorship 32:17,19,24
site 138:25	sought 41:10	staff 12:24 27:8 49:9 79:7 126:19
sites 91:17	sounds 60:25 124:4	stamped 6:8,10,12,14,18
sitting 11:25 88:15	source 32:14 161:6	standard 100:3 148:3
situation 161:7	sources 124:14	standing 26:19 46:15,17 47:8 52:11,16 55:13,23,25 56:1,19,22 59:3 85:6 129:14
six 23:3,19 30:15 138:14,15 140:6,11 142:16 143:14 152:19	south 155:15	started 8:15 127:17 148:1
six-day 138:21	Southern 1:1 7:15	starting 8:18
sixth 38:12	Southland 60:21	starts 100:15
size 129:2		state 1:11,21,22 2:2,7,16,17 3:8 6:4 7:11,20 9:1 12:6,14
Slaughter 4:23 165:23		
sleep 9:20		
sleepy 9:18,19 10:9		
snail 114:13		

14:20 22:22,23,25 23:1,6,15,18 24:8,18,21 26:23 27:3,19 28:13 31:9,12 32:1 33:24 34:20 35:2,4,24 36:2,5 37:10,13 46:15 47:3 48:18 52:8 53:2 57:9 62:8 76:7 78:9 81:12,19,25 82:8,13 83:11,25 84:2 85:3,5,8,19,20 86:15 87:10,22 95:25 100:9 107:5 111:21 112:12,14 113:14 119:9 126:23 127:8 135:9 142:3 157:24 158:6 159:24 161:1,4,8 164:9,23 165:1,6 stated 3:12 15:23 20:3 41:16 62:16 64:6 92:8 137:17 138:4 144:12 146:15 161:16 state-issued 78:7 statement 36:11 98:16,20 104:13 107:7,9 115:3,22 117:20,23 154:24 statements 36:14 states 40:4,8,12 114:18 159:21 160:6,8,19,23 161:12 162:6 State's 112:2 STATES 1:1,13 4:13 statewide 23:12 57:10 stating 10:25 15:6 111:15 statistics 131:19 137:17,19 status 35:15	 stayed 26:2 STEEN 1:10,21 2:6,16 stenographically 165:11 step 114:24 Stephen 4:8 7:10 16:1 129:10 130:3 stephen.tatum@texasattorneygeneral.gov 4:11 steps 114:20 STEVE 1:22 2:7,17 sting 117:24 118:2,5,9 stings 127:10 stop 34:24 46:9 144:5 stories 149:11 150:3,14 story 148:16,22 150:4 straight 111:22 Street 4:4,9 strictly 89:25 string 123:16 strong 39:17 structure 26:3 student 78:7 students 34:9,11 78:6 92:18 studies 59:6,11 70:18 124:13,18,21 137:16 subject 16:5 48:1 82:24 86:6 130:24 159:24 submit 33:20,23 submitted 123:7,9 subscribed 164:15 165:16 subsequently 138:13	 succeeding 15:17 successful 68:24 69:2 127:16 suffered 129:20 suffering 9:21 sufficient 130:15 sufficive 78:8 Suite 3:10 4:23 165:23 summaries 33:21 summarization 62:24 summarized 105:2 137:15 summer 83:5 Sunday 154:13,14 Sundays 89:12 sundry 148:10 super 89:12 supervise 27:6 35:14 supervising 35:7 36:3 supervision 35:17 165:12 supplement 129:15 161:22 support 4:22 32:17,19 142:22 158:11,14 159:4,6 165:22 supporting 57:12 68:18 supposed 31:25 32:1 sure 12:16 14:8,12,13 17:3 23:4 24:25 41:24 42:8,11 44:10 46:12,23 49:5,8 53:18 56:18 59:1,14 65:7,9 69:4,5 70:9 74:12 80:6 82:20 85:15 87:21 88:7,13,21 89:11,21 90:9,20 91:17 95:15 96:5 97:21 103:14
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>105:13 108:9,11,22 109:20,23 111:4 112:11,17 125:15 128:21 147:10 150:17 151:11 153:2 156:25 160:24 161:5</p> <p>surrounding 127:13</p> <p>surveys 55:17 56:24</p> <p>sworn 3:5 7:4 10:12</p> <p>system 97:5 136:16 145:11</p> <hr/> <p style="text-align: center;">T</p> <p>Table 95:18,19</p> <p>taking 10:1 44:10,12 45:14 114:19 142:20</p> <p>talk 15:7 57:18 69:23 80:2 140:15 155:22</p> <p>talked 89:19 94:3 118:4 126:8 148:8</p> <p>talking 21:15 38:2,3,4,6,7 42:24 45:15 57:7 59:11,15,17 62:15 69:15,23 74:2 78:15,16 88:17 126:7,11 129:25 130:5 133:7 136:20 139:6 156:2 159:13</p> <p>TaNeika 119:3</p> <p>tasks 31:10 121:18</p> <p>Tatum 4:8 5:6 7:7,10 8:21 9:2,3 13:23,25 14:2,5 16:8,9 17:4 19:5,8 20:7 28:16 30:13 40:19 41:3,4 42:9 47:21 48:4,6 51:2,9 52:14,24 62:10,12,14 70:13 83:3,5,8 94:12 95:2,4 98:14 99:3 105:21 113:19 116:9 119:17 122:6,8,13,15 123:17,24 124:2,5,6 125:9 126:2,5 129:22</p>	<p>130:1,4,8,11 131:1,6 151:2 162:2,7</p> <p>tax 135:8</p> <p>taxes 133:19 154:25</p> <p>TAYLOR 2:11</p> <p>TCET 95:11,14 96:4,17</p> <p>Technology 23:11</p> <p>teleconference 4:13</p> <p>Telephone 8:11</p> <p>ten 85:19 102:15 103:19</p> <p>tend 49:20</p> <p>Tennessee 25:15,17</p> <p>term 24:9 60:17</p> <p>terms 129:19</p> <p>test 107:3,15,20,22 108:2 118:3,10,13,25 122:22 123:1 155:12</p> <p>testified 7:4 129:19</p> <p>testify 15:24 16:11,20 17:14,17 18:11,19 20:2 70:3 142:4</p> <p>testimony 41:2 54:5,9,13 62:25 68:24 69:1 70:14,17,23 73:1 165:10</p> <p>testing 126:12 133:20</p> <p>tests 107:11 108:8,13,21 109:9,14,19 110:1 111:24,25 127:9</p> <p>Texas 1:1,7,10,14,17,21,23 2:2,3,7,8,16,18 3:8,11 4:10,24 6:4,16 7:11,16,19,25 8:25 14:20 15:23 16:3,10 19:21 20:11,14,16 21:12,15,16</p>	<p>22:5,10,18 23:5,23 24:2,4,5,8,16,17 25:4,19 26:13 28:17 29:7,9 30:11,24 31:6,17,19 32:15 33:2 35:1,4 36:2,5,7,9 37:10 38:23 39:21 40:11,20 41:5,9,16 43:7 44:1,25 45:13 46:22 48:22 49:14 50:17,18,22 51:10,11 53:5,12 54:8,22 55:16,20 56:20,24 57:3,21,23 58:7,10,22 59:8,12,23 61:5,6 62:21 63:10 65:4,21 66:24 67:6,7,16 68:5 69:8 70:1,14 71:2,25 72:21 73:20,23 76:2,3 78:17 79:1,15,22 80:3,4,10,20 82:15 84:21 87:9 88:5,9,23 89:5,17,23 90:2,17 91:6 92:7 94:5 95:17,19,21 96:18 97:3,7,12 100:6 102:9 104:2,21 113:15 119:11,14 120:6,10 121:6,8,12 124:7,12,24 126:7,16 127:10,21,23 128:17,24 130:12 131:7,9,23 133:12 134:15 135:7,9,21,23 136:10,15 137:22 138:20 141:18,24 142:22 144:19 146:7 151:22 152:9 153:4,5,7,11 156:6,16 157:19 158:2,3,11,14,20 159:3,14,20 160:6,12,22 161:9,14 165:1,6,23</p> <p>Text 29:19</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

textbook 63:15	throughout 30:8	truthfully 10:7
textbooks 63:9	title 15:16 20:19	try 11:1,5 56:2 77:1
Thank 9:2 17:1 83:10	titled 111:12 159:25	84:16 89:6,13 102:3
95:4 131:1 134:10	today 9:17,22 10:12	123:4 127:6 154:2
that's 8:19 10:10	11:15,23 12:4 13:14	trying 23:7 24:24
11:24 17:15 19:3	15:23 17:17 18:16,19	38:18 45:10 64:23
21:10,13,22 22:2,6	39:1 68:15 161:24	97:16 100:2 102:21
23:12,14 26:17 28:23	today's 16:7	108:4 112:6 146:2
37:6 38:12 43:9 45:3	top 41:25 42:1 105:6	147:14 148:2 158:21
47:24 51:20 52:15	106:22 117:15	TSC00006029 6:10
53:22 54:23 56:17	topic 42:13 47:10,22	TSC00006032 6:12
62:1 63:18 72:7	48:8 70:25	TSC00006037 6:8
76:15 81:24 88:1,15	topics 14:1 15:25	TSC00006058 6:21
93:8 95:7 97:22	16:4 18:11,18 86:14	TSC00006061 6:14
99:23 104:4,22 105:9	totally 147:7	TSC00006062 6:18
106:7 112:5,8 119:4	totals 34:3	turn 15:9 106:19
122:10 123:16 125:10	touch 78:20	114:11 117:6
127:14 129:17 130:8	towards 60:14 64:18	turnout 89:16
132:24 138:17 140:22	78:11 89:18 133:14	two-thirds 66:9
142:17 143:12,22	134:16	type 133:10 155:4
145:2,20,23 146:25	track 159:20	160:20
152:21 153:9,23	tracking 161:10	types 34:5
154:1 156:4,14 161:1	traditional 154:10	typically 54:13
Theirs 139:11	transcribed 165:12	<hr/>
Thereabouts 103:20	transcript 70:21	U
thereafter 165:12	125:22,24	U.S 4:16
therein 164:17	transferred 26:7	uh-huh 100:13 119:12
thereof 165:15	transportation 136:16	ultimate 35:12,13
there's 15:13 17:5	137:2,10 139:9	151:15
37:21 63:5 93:13	travel 139:21 140:2	ultimately 47:13
104:6 111:14 113:2	treasurer 61:8	Um-huh 104:14
131:19 132:1,14,15	Trial 4:15	um-hum 14:11 17:9
136:18 146:16	tried 68:22 100:15	19:10 21:20 23:20
they'll 147:2	147:22	24:15 25:1,3 33:3,19
they're 21:21 33:25	trip 159:10	34:12 35:6 47:12,14
57:10 58:2 60:24	true 47:8 153:6 164:3	51:12 52:2 54:20
61:21,25 68:16	165:12	58:6 61:13,23
75:10,11 86:22	truth 10:12	62:19,23 65:13 71:23
108:16 144:10,11	truthful 9:23 10:3	72:13,22 73:19 74:5
153:24 157:5		76:22 79:13,21
they've 21:23 73:4		83:1,13 84:7,20
143:19 157:5 161:8		90:16 91:8 93:15
third 117:8 118:17		

<p>94:14,21,25 95:20 96:10 98:4 100:17,19 103:2,23 106:21,25 110:3,18,22 111:7,13 112:3 113:1,4,7,21 116:25 117:9 122:24 134:14 137:21 138:17 141:1,14 147:13 148:17,20 151:21 159:16</p> <p>unable 39:8,11 92:8 108:8</p> <p>unaware 130:12</p> <p>UNCERTIFIED 125:21</p> <p>understand 10:11,17 11:8,10,20 17:4,8,9,13 18:24 24:25 55:13 58:25 65:7 78:7 88:7 103:14 148:14 157:1</p> <p>understanding 36:20 144:1</p> <p>Understood 134:5</p> <p>unemployment 137:4</p> <p>unexpired 38:10,25 115:24 116:2</p> <p>unfortunately 58:16</p> <p>UNION 2:13</p> <p>unit 24:11 25:18,20 26:8</p> <p>United 1:1,6,13 4:13 40:8,12 162:6</p> <p>units 21:18,19,21 22:25 24:9 26:17,21 30:8 31:20 34:5,7,14,23,24 52:4 55:8 57:9 68:16 71:16 81:9 87:14 90:6,8 91:18,25 107:2 114:12 119:7 127:18 128:1,6</p> <p>unless 11:18 136:19</p> <p>unnecessarily 154:25</p>	<p>updates 57:16 80:22</p> <p>upon 16:18 86:16 124:22</p> <p>Urgent 6:14</p> <p>usually 34:8 58:19 79:2 86:22 91:25 139:23 141:12 154:11</p> <p>utility 9:7</p> <p>utilization 79:6 97:9</p> <p>utilize 97:6,7 135:1</p> <hr/> <p style="text-align: center;">V</p> <p>vague 70:8</p> <p>valiant 39:18</p> <p>values 36:14</p> <p>varies 65:1</p> <p>various 25:13 27:4 31:10 32:7 33:1 51:11 52:11 56:1 57:10 70:3 100:8 111:5,14 148:10 160:16</p> <p>vary 30:13 65:3</p> <p>vast 60:20</p> <p>VEASEY 1:3</p> <p>veer 61:17 62:18</p> <p>venture 67:23 80:7</p> <p>version 123:11 125:21</p> <p>versus 26:9 89:8 159:25</p> <p>Veterans 115:21</p> <p>VFW 115:19,22 116:1</p> <p>via 4:13 24:10 45:4</p> <p>vice 104:16,20</p> <p>victim 146:8</p> <p>virtual 96:25</p> <p>virtue 142:11 157:22</p> <p>visit 57:8 114:24</p>	<p>vital 131:19</p> <p>voice 67:17 68:6,21 69:10,24 70:3</p> <p>voices 69:5</p> <p>voluntary 21:8</p> <p>volunteer 68:14 90:1 103:12</p> <p>volunteering 103:18</p> <p>volunteers 31:8,14 68:18 69:16 89:24</p> <p>vote 37:12 38:18 39:3,9,11,14,17,19,20 40:6 44:2,4,7,9,23 45:7,13,20 66:9 71:20 72:8 73:11 74:17 76:13 78:5,8 84:3,4 85:2 87:7 89:8,9 90:5 91:9 92:6 97:11,17,18 101:9,20,23 102:6,23 104:9 115:25 116:3 120:13 127:20,24 128:19 133:17 134:4 135:13 140:24 141:3 144:4,7,15 147:6 149:4,6,17,22,24 150:5,7,20 151:5,17 152:3,8,10,17,19,23 153:8 154:6,11,13,15,17 155:6 156:6,7,10,11,23 157:22 158:17,19,21,22</p> <p>voted 39:5 44:22 48:8 124:22,25 157:20</p> <p>voter 37:11 40:5 54:12 56:24 71:3,6,7,8,9,13,21 72:2,5,10,11,14,21,24 73:13,15 74:2,3,8,12 75:1,14 76:5,9,23 77:6 79:19,23,24 85:22 86:5,10 89:15 95:11 96:8,21 100:4</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>101:2,5,6,7 102:25 103:6 117:16,25 118:6 124:9,10,15 131:24 132:5,7,13,18,21 133:14 134:12,23 135:1,5 138:13 145:14,19,23 146:1,9,21 148:5 149:3,18,19,23 151:1,4 152:2,7,18 153:16 154:7 155:17 157:4,6 158:11,14,24 159:14,21,23 160:5,9 161:11</p> <p>voter-assistance 89:19</p> <p>voter-registration-type 73:21</p> <p>voters 37:9 88:6 90:3,4,17 91:7 98:3,15,19 127:23 142:14 148:3 153:12 157:13</p> <p>voter's 40:3 149:7,8 150:2 152:18,21</p> <p>Voters 1:14 50:19 57:23</p> <p>votes 125:1 158:6</p> <p>voting 4:15 62:4 69:22 71:13 73:12,17 80:19 81:1 88:11,12,13,18 89:3,4,5,7 94:1 101:14,16 102:4 127:7 135:21 140:19,22,23 141:7 142:13 143:20 144:22 147:25 148:1,9,25 149:1 151:24 152:1 153:12,17 154:8,9,12 155:25 156:14,17,18</p> <p>vouchers 31:5</p> <hr/> <p style="text-align: center;">W</p>	<p>wait 10:24 15:4 waiting 68:20 153:20 War 115:21 Washington 4:17 wasn't 49:1 70:20 151:5 ways 66:1 77:11 145:18 website 46:22,23 111:21 112:2 week 30:9,16,17 95:10 weekend 81:16 84:8 weekends 84:9 weeks 39:7 we'll 15:22 19:1 162:7 well-educated 155:20 we're 7:18 31:25 32:1 61:2 70:10 92:10 94:8 124:3 125:11 126:2 129:10,24 130:2,5,11 133:7 139:6,24 158:23 159:10,13 West 4:4,9 we've 53:7 76:6 77:8,21 78:2 91:19 94:3 whatever 58:20 63:25 68:17 75:25 108:15 144:6 145:12 155:24 Whenever 123:20 whereas 75:15 137:5 whereof 165:16 wherever 146:5 whether 27:2 32:7 58:2 64:24,25 68:16 90:12,13 92:13 128:8,24 134:3 145:2 146:3,4 148:12 155:6 158:8</p>	<p>whichever 24:9 white 135:24 137:24 Whoa 107:16 whoever 113:12 whole 55:22 77:25 93:10 143:15 whom 49:11 59:4 who's 52:24 whose 164:15 wife 104:19 willing 16:14 114:25 wish 154:23 witness 3:4 14:7 15:24 16:23 17:1 47:20 51:8 52:15 83:7 93:12 116:12 119:23 122:12 123:23 131:5 147:19 162:3,11 165:9,10,16 Wolf 130:6 wondering 134:11 work 51:17 56:8 60:10 71:11 80:8 95:11 96:4 108:17 109:6 131:16 136:23 142:21 154:3,10,11,12 157:8 worked 128:7 154:1 working 23:23 91:19 works 51:16 workshop 83:19 84:23 85:21 87:1 workshops 81:2 82:1,4,14 83:15,20 84:10 85:11 86:4,6,7,8,15,18,25 87:8,12,19 worst 63:17 worthless 135:6 write 100:18 107:9 writing 32:22</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

written 106:5 111:12
152:21
wrong 83:4 155:24
wrote 75:17 105:15
106:2,9 118:1

Y

yadda 112:20,21
y'all 69:20 84:2
150:4,8
yannis 12:24 27:8,12
51:16 53:2 54:15
59:19 60:3 79:6
91:19 104:6 105:15
113:2 114:10 123:9
yearly 26:4,9
yet 129:19
Young 1:14 50:19
57:23
younger 155:10,11
yourself 49:24 54:4
68:19 117:2
youth 22:22,23,24
23:1,6,18 24:19
26:21 30:4 34:7
46:13 47:4 52:21
56:8 61:16
youth-related
92:19,22
you've 10:11 16:10
18:16 22:13 23:17
57:21 77:4 89:19
90:18 103:18 148:15
155:8 161:20,23